Sheila_O'Connor@fws.gov on 12/20/99 03:21:18 PM

To:

Diane Sharrow/R5/USEPA/US@EPA

CC:

Subject: Rouge Steel

Diane,

Here's the story on the rehab records:

the number 313-943-2077 is for the Dearborn Animal Shelter, a non-profit org. Rouge must have called them for the birds. They then notified City of Dearborn Animal Control.

I spoke with Animal Control Officer Joanie Krekaeu (City of Dearborn). She recalls picking up appx. 5 Canada geese from the Rouge Steel Plant (no other species of birds) last summer ('99). She said it was not as bad as the previous summer ('98). From the sound of it, Animal Control did not keep any records. Offcr. Krekaeu did say that most of the oiled birds she picks up from Rouge Steel are in the summer.

From Animal Control, the birds were picked up by Betty King, a federally licensed wildlife rehabilitator. Betty is checking her records for me right now. I asked her for records for the last 2 years.

I will let you know when I receive them.

Happy Holidays,

Sheila O'Connor



To:

Gaylene Vasaturo/R5/USEPA/US, Mary Mcauliffe/R5/USEPA/US

CC:

Subject: Rouge Steel and Miscellaneous

Gaylene,

FYI - very few birds are not protected under Migratory Bird Treaty Act - European Starlings, European House sparrows, European house finches, mute swans. www.epa.gov/owow/birds and www.fws.gov/r9mbmo/intrnltr/mbta/mbintro.html are useful web sites on this

topic, among others

Spoke with FWS/Agent O'Connor:

The birds they specifically identified at the site, were cardinals, small songbirds, Hairy Wood Pecker, Mourning Doves. Plus Poitven told Agent O'Connor Kildeer nest in the rocks and gravel at the site and Commorants, Ducks and Geese are often seen on the adjacent Rouge River.

She also told me she has photos and should have Lab report soon. The shelter in Dearborn where birds were taken is not federally licensed. She said its not a bid deal, but she wants to personally visit them to ask for reports so she doesn't "ruffle their feathers" to the point that they are uncooperative. She hopes to visit them next Monday at the same she talks to City of Dearborn Animal Control Officer.

Mary,

Sheila O'Connor said Paul is transferring to Ohio!!

She and the Contaminants Biologist out of E.Lansing also want to go to National Steel site in January. Any atty. out there working on National Steel?

Thanks,

Diane



UNCONTROLLED COPY

Rouge Steel Company Emergency Response Plan

November 1999 Revision



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1.0 PURPOSE

Rouge Steel Company (the Company) has developed this Emergency Response Plan (ERP) to address situations and conditions that may arise during operations at our facilities. This ERP describes the procedures to follow for various types of emergency situations.

Our goal is always to protect people first and foremost. While it is not possible to foresee every possible condition and circumstance that may require an emergency response, the Company will undertake those emergency response actions that are protective of human health, the environment, and Company property. These considerations must be the main priority in planning and/or undertaking any emergency response action(s).

Louis D. Camino

President, Rouge Steel Company



2.0 GENERAL EMERGENCY RESPONSE ACTION PROCEDURES

2.1 Fire

Only trained employees who have been designated by RSC as fire response personnel, Rouge Steel Fire/Rescue Officers (Rouge Steel Fire Department), should attempt to extinguish fires.

The duties of all other employees upon discovering a fire emergency are described below:

- 1. Warn (verbally) others in the immediate area.
- Contact (via telephone or radio) the Security or Fire Sections and report the
 fire. Be sure to accurately describe the location and size of the fire emergency.

 <u>Do not hang up the telephone until instructed to do so.</u>
- 3. Shutdown critical equipment as necessary.
- 4. Evacuate to the nearest assembly area, using the most direct, safe route. Use an alternate route if the primary route is blocked by fire and/or smoke.
- 5. Supervisors will remain in the area to assist hourly employees in evacuation, then will evacuate themselves to the nearest assembly area.

THE PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES IS TO NOTIFY SECURITY AT X78888 OR FIRE EMERGENCY AT X23313 OR MEDICAL EMERGENCIES AT X21133.

2.2 Chemical Spills/Releases

Chemical spills and/or releases have the potential to threaten human health. This can take place through a variety of ways such as: physical contact with the material, the inhaling of vapors or gases emitted by the material, by the mixing or contact of the spill with adjacent materials that may react with the spilled material, or by fire/explosions that may occur as a result of the chemical spill.

Most hazardous materials in the Rouge Steel facility are kept in locations where liquid spills can be readily contained within a concrete vault or other secondary containment enclosure. Of most concern from an emergency response perspective is spills from system piping or from the equipment itself. In particular, the Pickle Lines



have occasional spills/releases of acids from process lines. Where hazardous materials are kept and/or used, personnel in those areas who are trained in the recognition of small spills and the proper cleanup response should do so. Evacuation of the department and/or area is the proper response for situations involving large releases of chemicals, especially those that are flammable, reactive, toxic or corrosive.

The Rouge Steel Environmental Department has prepared a Spill Prevention Control and Countermeasures (SPCC) and Hazardous Waste Contingency Plan to address the response to spills of hazardous chemicals at RSC. Personnel trained in the contents of these plans are permitted to respond to chemical spills in a limited way. Other personnel who have not been specifically trained in emergency response to chemical spills must evacuate the area and are not permitted to respond. The closing of supply valves, shutting down critical equipment and other such activities that do not expose personnel to chemical hazards is permitted for persons not trained in emergency response, but who have been trained in how to do this.

IN THE EVENT OF A LARGE CHEMICAL SPILL OR RELEASE -

- 1. EVACUATE PERSONNEL IN IMMEDIATE AREA, FOLLOW PROCEDURES DISCUSSED IN 2.11
- 2. ISOLATE THE IMMEDIATE AREA
- 3. CALL THE RSC SECURITY DEPARTMENT AT 78888
 AND REPORT THE SPILL/RELEASE
- 4. INITIATE FEMCO ALARM ANNOUNCEMENT
- 5. BROADCAST EMERGENCY MESSAGE BY RADIO
- 6. CONTACT RSC ENVIRONMENTAL ON PAGER 3 (313) 714-9501 AND REPORT THE SPILL

Security will summon the designated Incident Commander, and will call and direct Emergency Responders to the assembly area designated by the Incident Commander for the spill. Security will also summon the Rouge Fire Section. The Incident Commander will evaluate the hazards of the spill and determine if defensive response actions can be taken. If defensive response action can be taken without endangering any Rouge Steel personnel, the Incident Commander will direct the response team to



isolate or control the spill. Defensive response is limited to spill control actions that do not require any of the following:

- 1. Physical contact with the released material.
- 2. Respiratory protection.
- 3. Protective equipment or ensemble beyond Level D.
- 4. Response personnel with training beyond Operations Level.

If defensive response measures cannot be safely taken, the Incident Commander (IC) will cause all Rouge Steel responders to evacuate the area. The IC will have Security notify the Dearborn Fire Department that a chemical emergency has occurred. The IC will have Security contact the designated on-call Emergency Response contractor, whose telephone number is provided on the Emergency Contacts phone list. The Rouge Steel IC will maintain a perimeter around the chemical spill area and will remain on duty until properly relieved by an Incident Commander from the Dearborn Fire Department, Emergency Response contractor, or other qualified agency.

2.3 Tornado/Severe Thunderstorms

Tornadoes are one of the most frightening and damaging weather phenomenons that the RSC facility may be exposed to. Damage from a tornado striking the RSC facility may range from moderate to extreme. Fortunately, the likelihood of a strike or near miss by a tornado is remote - but not remote enough that possibility can be ignored.

Damage from a tornado or a severe thunderstorm is due to high winds, heavy rains, and or lightning. Employees working outdoors and in large, open bays are at the most risk of injury due to wind-driven projectiles (dust, debris, metal and wood fragments, etc.). Lightning strikes are possible, and personnel in portable outdoor cranes should be evacuated whenever an approaching storm (severe or otherwise) is capable of producing lightning. Persons working near such cranes are at particular risk, and must pay careful attention to potential lighting conditions.

The decision to evacuate personnel to designated shelter areas is one that cannot be taken lightly because of the sudden nature of tornadoes and severe thunderstorms. Additionally, because tornado and severe thunderstorm warnings are often issued for entire counties, there is an uncertainty about weather RSC operations will be affected.



Because of this uncertainty, the following actions will occur as watches and warnings are issued:

Tornado or Severe Thunderstorm Watch

When a watch is issued, the RSC Security Office will convey this information to supervisors over the radio. This information will be used by the supervisor for planning purposes and to alert his/her work crew(s), crews working out of doors and all other personnel to be prepared to move to a safe area should conditions warrant. In particular, supervisors with personnel on roofs or in outdoor cranes should alert the personnel to be ready to evacuate should conditions warrant. As information is available from the National Weather Service, the RSC Security Office will communicate information on the time of severe weather impact over the radio and by telephone to members of supervision in the various Company locations employing the respective radio channels and on appropriate telephone numbers.

Severe Thunderstorm Warning

In the event a severe thunderstorm warning is issued, the RSC Security Office will broadcast an alert to supervisors over the radio to prepare the RSC facility for the impending storm. All outdoor crane activities will cease, loads landed, and operators evacuated indoors. All roof activities will cease, equipment and materials secured, and personnel evacuated indoors. All other outdoor work will be evaluated by the supervisor for safety in the event of high winds, heavy rains, and lighting. Work occurring in confined spaces will be evaluated by the supervisor to determine if a flash flood in the confined space is possible, and to evacuate the space if it is. Work in excavations will cease until the rain has stopped and the excavation has been reassessed and determined to be safe.

Bay doors will be closed as needed as the storm approaches. Remote and driver operated vehicles are to stop when conditions of visibility make safe operation of the equipment impossible. Production employees working indoors should remain at their workstations and be prepared to move to a shelter area should conditions deteriorate.

Tornado Warning

Should a tornado warning for the City of Dearborn be issued by the city authorities



the RSC Security Office will contact supervisors by telephone and or radio and will cause an announcement to be made over the FEMCO and by radio that a tornado warning has been issued for the area including RSC.

Supervisors will cause immediate evacuations of personnel working outdoors. These persons should report to the nearest shelter area. Bay doors should be closed.

Personnel working indoors should evacuate to shelter areas after they have safely shut down the equipment that they are working on. Personnel operating critical equipment should put the equipment in a stand-by mode (estimated stand-by time period of 30 minutes) and evacuate to the nearest shelter area.

An "all clear" will be announced by RSC Security to each area (by radio and telephone) to provide for further announcement by supervision over the FEMCO and over the radio when the danger has passed. If the tornado has caused damage to the RSC facility, the department supervisor will evacuate his/her personnel from the shelter area to the assigned assembly locations, using the safest evacuation route available.

IN THE EVENT OF A TORNADO WARNING -

- 1. SHUT OFF ALL POWERED EQUIPMENT IF THIS CAN BE SAFELY DONE
- 2. EVACUATE OUTDOOR PERSONNEL TO SHELTER AREAS
- 3. CLOSE BAY DOORS IF TIME PERMITS
- 4. EVACUATE ALL PERSONNEL TO SHELTER AREAS
- 5. MONITOR RADIO INSTRUCTIONS AND INFORMATION
- 6. AWAIT THE ALL CLEAR• SIGNAL

2.4 Power Failure

The RSC facility has several backup capabilities to provide electricity to major



equipment in the event of a power failure. Should a general power failure occur, the main efforts should focus on three areas; landing loads suspended by cranes, providing safe, portable lighting in areas where this is needed, and perhaps most importantly, ensuring that all personnel are safely located in areas where sudden equipment start-up will not cause injury.

As much as is safely possible, all powered equipment should be shut off and/or secured for sudden power startup. Prolonged outages will require that the department supervisor and/or engineering staff assess the condition of certain equipment prior to start-up.

IN THE EVENT OF A POWER FAILURE -

- 1. SHUT OFF ALL POWERED EQUIPMENT IF THIS CAN BE SAFELY DONE
- 2. MAKE SURE ALL PERSONNEL ARE LOCATED AWAY FROM POWERED EQUIPMENT THAT MAY START UP UNEXPECTEDLY WHEN POWER RESUMES

2.5 Winter Storm

Fortunately, winter storms seldom (if ever) strike without hours or days of well-advertised advance warning. Generally, winter storms present more of a production problem (getting employees in and out) due to heavy snowfall than an emergency situation.

In the event a severe winter storm is forecast, supervisors and management will plan for limited operations as may be required. Employees should call in prior to their scheduled shift to determine if they are to report to work.

2.6 Workplace Violence

Rouge Steel Security, the Dearborn Police Department, and the Labor Relations



Department should be contacted any time that an act of workplace violence has occurred. When a continuing threat to other personnel exists, the RSC Security Office should be contacted to arrange for communication and/or partial evacuation of areas exposed to the violence. The decision to cause an evacuation will be made by the Labor Relations Department, in consultation with the Dearborn Police Department. Evacuation commands will be made to supervisors over the radio system and/or telephone system.

2.7 Confined Space Rescue

The nature of confined spaces makes rescue difficult. Strict adherence to the Confined Space Entry Procedure is required. Prior notification to RSC Security before entry into any confined space is required. The proper confined space entry permit must be filled out and posted at the site. An entry attendant must be posted. The specific requirements are contained in the Confined Space Entry Procedure.

The Security Department should be notified in the event of a confined space emergency. Specific information concerning the nature of the emergency, the number of victims, the condition of the confined space, and the location of the entrance to the space must be provided to the Rouge Steel Company Security Office. Security will contact the RSC Fire Department and the Dearborn Fire Department which have the available resources to perform confined space rescue.

IN THE EVENT OF A CONFINED SPACE INCIDENT WHERE A CONFINED SPACE RESCUE IS NEEDED -

- 1. THE ATTENDANT SHOULD SUMMON HELP BUT OTHERWISE MUST NOT LEAVE THE ENTRANCE TO THE CONFINED SPACE FOR ANY REASON, UNLESS PROPERLY RELIEVED BY ANOTHER TRAINED ATTENDANT.
- 2. CONTACT BY RADIO OR CALL THE RSC SECURITY DEPARTMENT AT 78888 AND ADVISE THEM THAT A CONFINED SPACE RESCUE IS NEEDED.



2.8 Bomb Threat

The person receiving the threat should immediately call the RSC Security Office (on x78888) and report the threat. Company management will be notified.

RSC management will consult with the Dearborn Police Department and a determination will be made if an evacuation should occur and if a search for a suspicious device should take place. Of course, a suspicious device should never be handled in any way; a description of the device and its exact location must be given immediately to RSC Security.

When receiving a bomb threat, it is important to gather as much information as possible from the caller so that the threat can be evaluated. This information should include the following:

- 1. Exact location of the device
- 2. When will it go off?
- 3. What kind of bomb is it?
- 4. What does it look like?
- 5. Why did the caller place the bomb?
- 7. Where are you calling from?
- 8. Who are you? (sometimes this works)

It is important to keep the caller talking so that as much information as possible can be obtained. Information such as sex, race, age, accent, language used, mannerisms, and background noises that are observed or disclosed during the call can be used to identify the caller. Remember: Don't panic!

2.9 Structural Failure/Roof Collapse

In the event of any sudden failure of any RSC building structure or roof, the RSC Security Office should be notified by RSC personnel observing or discovering the failure. Security will call the Rouge Steel Fire Department and the Dearborn Fire Department.

The Rouge Steel Fire Department or Dearborn Fire Department will then determine



the extent and need for evacuation and additional safety measures.

2.10 Emergency Rescue and Emergency Medical Response

Only trained employees who have been designated by RSC as fire response personnel, Rouge Steel Fire/Rescue Officers (Rouge Steel Fire Department), will attempt to perform emergency rescues or to provide emergency medical assistance.

The duties of all other employees upon discovering an emergency rescue situation or an emergency medical situation is described below:

Contact (via telephone or radio) the RSC Security Office and report the emergency. Be sure to accurately describe the location and nature of the emergency. <u>Do not hang up the telephone until instructed to do so.</u>

Internal first response capability to fire, rescue, and medical emergencies is provided by the RSC Fire Department and Ford Fire Department on day shift, and by Ford Fire Department on the off shifts. Reference to the RSC Fire Department equates to the Ford Fire Department on the off shifts. The Dearborn Fire Department remains the primary responder.

2.11 Evacuation

In the event of a fire, chemical release, or other emergency where a general evacuation is ordered, all personnel will proceed to the designated assembly location nearest to their location. The safest evacuation route will be used for evacuation. An evacuation may be initiated for a local area (usually by voice or radio command) or for a larger area by FEMCO alarm instructions.

Supervisory staff will remain in the evacuated department/area to give instructions to hourly personnel on the best evacuation route to use and to provide a reminder on where to assemble. Supervisory staff will ensure that critical equipment shutdown has occurred in their department, and that all personnel have evacuated the area before they evacuate themselves to the assembly point.

Once the supervisor reaches his/her assigned assembly point in a safe manner (which may involve walking around the plant from the point the supervisor exited the plant to



his/her assigned assembly area), he/she will perform a head count of evacuated personnel to determine if anyone is missing. If someone is missing, the supervisor will contact other supervisors at the other facility assembly points to determine if the missing person(s) is at one of these locations. Should personnel be found to be missing, the supervisor will poll his/her staff to determine where the missing person(s) may have been prior to the evacuation. If the personnel are still missing at this point, the supervisor will contact the RSC Security Office via radio to report that the person(s) is missing, along with providing any information about the person's or persons' condition and last known location. The RSC Security Office will relay this information to the on-scene Incident Commander (IC) for use in a search of the building/area, at the discretion of the IC.

3.0 Specific Locations

Evacuation Routes
Assembly Locations
Shelter Areas
Critical Equipment Shutdown Procedures

Emergency response information contained within this section is building specific. Evacuation routes and assembly locations are given in the attached drawings, which are also posted in the respective buildings. Shelter areas for the building are listed and marked on the building diagram (See Appendix A).

Critical Equipment Shutdown Procedures

Critical equipment is defined as processes and equipment that cannot be shut down without either creating a greater hazard to personnel or causing an unacceptable loss of capital or production. Where critical equipment is identified, the specified critical equipment shutdown procedure is to be followed before evacuating the area. Generally this will result in the equipment being placed in a "stand-by" condition for up to ½ hour.

The following departments have special instructions for equipment shutdown and evacuation:

BLAST FURNACES - CRANE OPERATORS (All Areas)
Immediately set down any load in a safe area and proceed to the nearest boarding



ladder. Shut power off to crane and report to evacuation area where the unit you service evacuates.

BLAST FURNACES - BLOWER SUPERVISOR (Both Furnaces)

Immediately initiate standard shutdown procedures for Blast Furnace being attended. Follow the normal Operating Procedure for this action.

BLAST FURNACES - WATER TREATMENT OPERATOR

Immediately after both furnaces go off wind, shut down all pumps and report to your assigned evacuation area.

BOF - HOT METAL POURER

Immediately stop pouring hot metal; disconnect the electrical cable from the bottle on the scale; report to the evacuation area east of the Dekish building.

BOF - DESULF OPERATOR

Immediately raise the lance out of the ladle and stop the injection process. Report to the evacuation area east of the Dekish building.

BOF - VESSEL PERSONNEL

Immediately stop the process; raise the lance and swing it home; leave the vessel in an upright position; terminate power to the vessel, and lockout. Evacuate to nearest assembly area.

BOF - CHARGE CRANE

Immediately set down any load. FULL LADLES ARE TO BE PLACED ONLY IN THE DESULF OR ONE OF THE RELADLING PITS. Park the crane; turn off the power, and report to either the east BOF Lab or east Dekish evacuation areas.

BOF - TEEMING CRANE

Immediately set down any load. FULL LADLES ARE TO BE PLACED ONLY IN THE OUTBOUND STAND OR TEEMING CAR. Park the crane; turn off the power, and report to the east BOF lab evacuation area. If a heat is being poured, once the ladle is shut off, rack it over the slag dump; turn off the power, and proceed to the evacuation area.

BOF - FIRST CASTER



Immediately stop what you are doing and proceed to the east BOF lab evacuation area. If a heat is being poured, immediately shut off the ladle; disconnect the power cord and air line from the ladle, and proceed to the evacuation area.

BOF - BOILER OPERATOR

Immediately shut off the oxygen; start up the stand by circulating pumps (all 4 pumps). Shut off feed water pumps; turn blow down switches to the "ON" position; proceed to the west side of the New Tundish Yard evacuation area.

COLD MILL - 1, 3, AND 4 PICKLE LINES (J and K Sections)

Stop charging coil, shut power off to entry and delivery sections. Pickle line delivery section - shut off power to line.

COLD MILL - ACID MAN (J and K Sections)

Stop charging acid or pumping waste acid out. Turn pumps off.

COLD MILL - TANDEM MILL (X Section)

Stop charging coils and shut power off to mill.

COLD MILL - SLITTERS AND ROLL GRINDERS (X Section)

Stop coil or roll in progress and shut power off to unit.

COLD MILL - ANNEALING FURNACE OPERATOR (Y Section)

Shut off natural gas supply to all furnaces using emergency shut off control.

COLD MILL - TEMPER MILLS AND RECOIL WELDER (Z Section)

Stop charging coil and shut off power to the unit.

COLD MILL - CRANE OPERATORS (All Sections)

Immediately set down any load in a safe area and proceed to the nearest boarding ladder. Shut power off to crane and report to evacuation area where the unit you service evacuates.

CONTINUOUS CASTER - LADLE CRANE OPERATOR

Immediately set down any load in the proper stand or car. Park the crane, turn off any power and report to assigned evacuation area.



CONTINUOUS CASTER - CASTING BAY CRANE OPERATOR

Immediately set down any load in the proper position, park the crane, turn off any power and report to assigned evacuation area.

CONTINUOUS CASTER - LRF PERSONNEL

Immediately stop what you are doing, shut off the MOD and report to your evacuation area.

CONTINUOUS CASTER - LADLE POURER

Immediately shut off the ladle, disconnect the power, air and long nozzle. Slew the turret to the E position unless there is another heat on the back of the turret. If there is another heat on the turret, leave the turret in the cast position. Report to your evacuation area

CONTINUOUS CASTER - MAIN PULPIT OPERATOR

Immediately after both strands go to withdrawal and you confirm that the E tank is dumping, report to your assigned evacuation area.

CONTINUOUS CASTER - TUNDISH YARD CRANE OPERATOR

Immediately set down any load in the proper stand. Park the crane, turn off the power, and report to your assigned evacuation area.

CONTINUOUS CASTER - WATER TREATMENT OPERATOR

Immediately after both strands go to withdrawal, shut down all pumps and report to your assigned evacuation area.

CONTINUOUS CASTER - STRAND OPERATOR

Immediately close the slide gate and push the withdrawal button. Switch strand over to the cutter pulpit. Report to your assigned evacuation area.

CONTINUOUS CASTER - STRAND HELPER

Immediately after strand operator pushes withdrawal button, push reminder of mold powder into mold and report to you assigned evacuation area..

CONTINUOUS CASTER - SLAB CRANE OPERATOR

Immediately empty all slabs off of pusher table and report to your assigned evacuation area.



CONTINUOUS CASTER - CUTTER PULPIT OPERATOR

Immediately after strand is switched over to you, wait until sixty-four inches has passed and increase speed to sixty-five inches a minute. Report to your assigned evacuation area.

HOT STRIP MILL - FURNACE PRODUCTION COORDINATOR

Shut off equipment, go to evacuation or shelter area as appropriate.

HOT STRIP MILL - NORTH PRO SET CHECKER

Shut off equipment, go to evacuation or shelter area as appropriate.

HOT STRIP MILL - CHARGING CRANE OPERATOR

Shut off equipment, go to evacuation or shelter area as appropriate.

HOT STRIP MILL - EXTRACTOR OPERATOR

Close all furnace doors, turn off extractor table rolls, go to evacuation or shelter area as appropriate.

HOT STRIP MILL - FURNACE OPERATORS (HEATERS)

Push Emergency Stop button to shut fire off on all furnaces. Go to evacuation or shelter area as appropriate.

HOT STRIP MILL - ROUGHING MILL PERSONNEL

Complete processing material in Mill, then shut down all Mills and table rolls. Go to evacuation or shelter area as appropriate.

HOT STRIP MILL - FINISHING MILL PERSONNEL

Complete processing material in Mill, then shut down all Mill equipment, tables, etc. Go to evacuation or shelter area as appropriate.

HOT STRIP MILL - COILER, BANDER/SCALE AND 350 PAD PERSONNEL

Complete processing material in Mill, then shut down all equipment. Go to evacuation or shelter area as appropriate.

4.0 Outside Emergency Response Contractor List



The Contractor list is maintained at the RSC Security Office.

5.0 Emergency Communications

Emergency communications will occur via radio between the RSC Security Office and supervisors/emergency responders. The RSC Security Office has the capability of transmitting/receiving on all RSC radio channels. In the event of an emergency, all radio traffic is to be limited to emergency-related messages only. The Incident Commander and/or RSC Security Office may designate one or more channels for emergency radio traffic, announcements only, or may restrict all radio communications. In the event of an emergency, telephone communication (if available) may be more reliable and should be attempted (if safe) as the preferred means of communication.

5.1 Alarm/Notification Systems

The primary means of emergency notification will be radio broadcast, followed by FEMCO broadcast. Supplementary means include verbal broadcast and by telephone. Contacting RSC Security should always be done immediately following the activation of any emergency notification/alarm.

For areas such as high noise areas, confined spaces, remote areas, outside the buildings, and in buildings without FEMCO systems, supervisors should confirm that employees have received the warnings.

5.2 Contractor Notification

Contractors are to be provided with Emergency Response telephone numbers for RSC Security, Fire Department, and Ambulance. Diagrams showing the building evacuation routes, assembly areas and shelter areas are posted in the respective buildings.

6.0 Incident Command System

In the event of an emergency, critical minutes can be lost if a central emergency authority is not recognized. RSC has developed an Incident Command System (ICS) for coordinating emergency responders, rescue efforts, fire suppression efforts, etc.



In the initial stages of an emergency, prior to the arrival of the Dearborn Fire Department (the primary emergency response organization at RSC), Incident Command will be held by the first trained Incident Commander arriving at the site of the emergency. Only trained personnel may respond in the event of an emergency, then only in the specific response for which they have been trained and authorized. Senior RSC Operations personnel who have been trained in emergency response are to report to the Incident Commander to support his or her efforts.

Incident Command transfers from RSC personnel to Dearborn Fire Department (DFD) personnel upon the arrival on scene of the Dearborn Fire Department (DFD). Command switches to the senior DFD responder. In all cases of Incident Command transfer, a formal acceptance of Incident Command is necessary.

All RSC personnel must follow the directions of the Incident Commander. The Incident Commander has the responsibility and authority to perform all necessary tasks to save lives and protect the environment and property.

6.1 Control of Emergency Response Areas

The RSC Security Department will follow the direction of the Incident Commander in securing the emergency area. These duties may include:

- Directing traffic
- Securing disaster areas
- Accounting for personnel
- Keeping unauthorized personnel, including would-be rescuers, out of the disaster area
- Assistance as may be directed by the Incident Commander

RSC Security Department personnel arriving at the emergency location should immediately check in with the Incident Commander to receive assignments. Once supervisory RSC Security personnel have arrived and have consulted with the Incident Commander, RSC Security personnel will take their directions from their supervisors.



7.0 Media Relations

Emergencies attract the interest of most people. Because of this, a major emergency will also attract the attention of the news media. For a variety of reasons, including the notification of family members of victims, RSC personnel should not discuss the emergency with media representatives. All inquiries must be referred to the RSC Public Affairs Department and/or the designated member of senior (vice-president and above) Company management.

RSC Security personnel are not to allow media personnel onto RSC property without the express permission of the Senior Vice President, Employee Relations and Public Affairs. The Incident Commander will determine the safe distance for media approaching the emergency area.

8.0 Program Maintenance and Administration

The primary maintenance and administration of this Emergency Response Plan (ERP) rests with the RSC Emergency Response Planning Committee. The ERP will be reviewed annually or following a major incident (which ever occurs first). The reviewing committee will be comprised of RSC Safety, Fire, Environmental, Engineering personnel, and UAW representatives.

The Spill Prevention Control and Countermeasures Plan (SPCC) and the Hazardous Waste Contingency Plan are the responsibility of the RSC Environmental Department. As needed, and on at least an annual basis, the RSC Environmental Department will review the current ERP for consistency with the SPCC and Hazardous Waste Contingency Plan.

8.1 Contacts for information on the Emergency Response Plan

Questions about the Emergency Response Plan may be directed to the Supervisor of the Company's Safety, Security and Fire/Rescue Sections, Mr. Joseph Saugrich (or to a designated alternate), or to the Manager of the Environmental Engineering Department, Mr. Donald Windeler (or to a designated alternate).

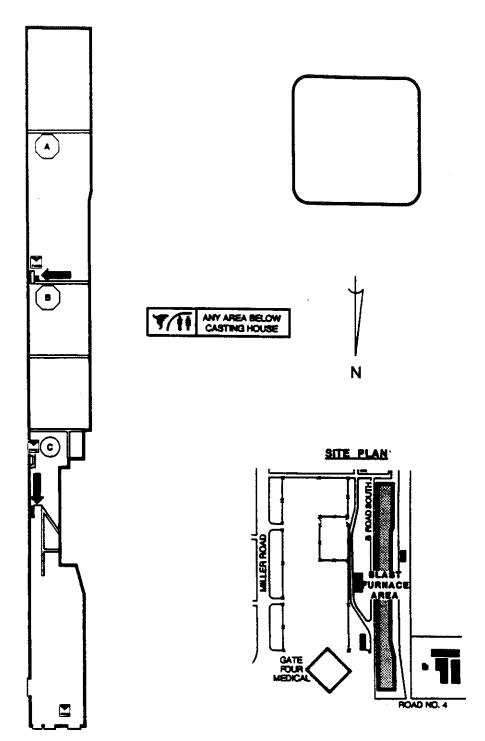


9.0 Emergency Response Telephone Contacts

A list of Emergency Response telephone contacts is maintained at the RSC Security office. This list contains contact information for Incident Commanders, Responders, Senior Company officials, Emergency Response agencies (Fire Department, Police Department, etc.), and Emergency Response contractors.

BLAST FURNACE AREA

EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

<u>KEY</u>



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



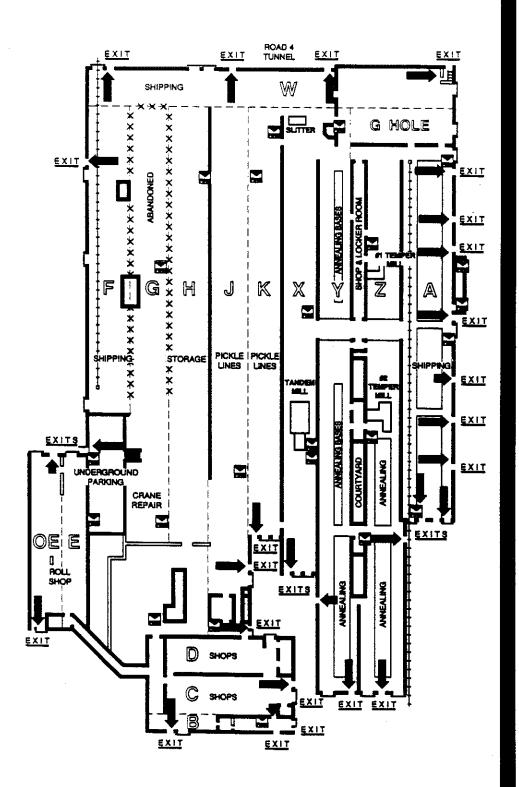
STAIRWAY

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COLD MILL / SHIPPING BUILDING

EVACUATION PLAN



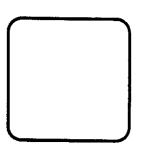
SITE PLAN

WALKWAY

TOOL & DIE BLDG.

FRAME PLANT

FRAME PLANT



KEY

TO EXIT LOCATION
FIRE ALARM PULL BOX

SECTIONS (A, B, C, etc.)

OUTSIDE ASSEMBLY AREA
(A, B, C, D)

TORNADO SHELTER AREA



EMERGENCY GUIDELINES

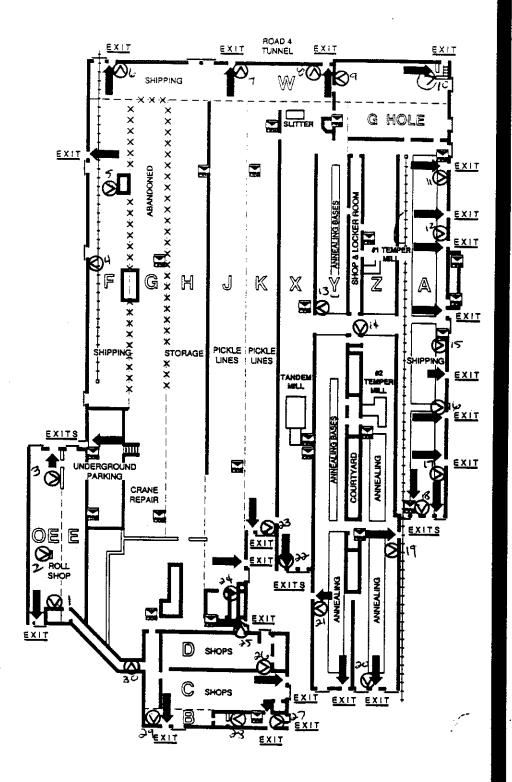
- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED <u>OUTSIDE ASSEMBLY AREA</u> WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

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COLD MILL / SHIPPING BUILDING

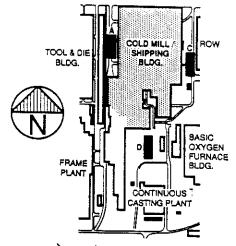
EVACUATION PLAN



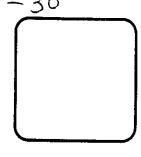
-11-11-11-11 PRINT

SITE PLAN

WALKWAY IN TUNNEL (SOUTH SIDE)



30 asplays -30



<u>KEY</u>

TO EXIT LOCATION



FIRE ALARM PULL BOX

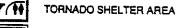


SECTIONS (A, B, C, etc.)



OUTSIDE ASSEMBLY AREA





STAIRWAY

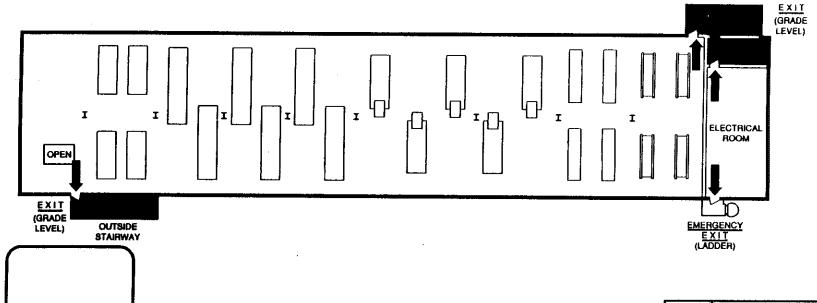
- **EMERGENCY GUIDELINES** A. FAMILIARIZE YOURSELF WITH ALL LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED <u>OUTSIDE ASSEMBLY AREA</u> WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

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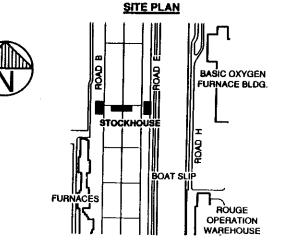
STOCKHOUSE

SCREEN FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.





KEY

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TO EXIT LOCATION



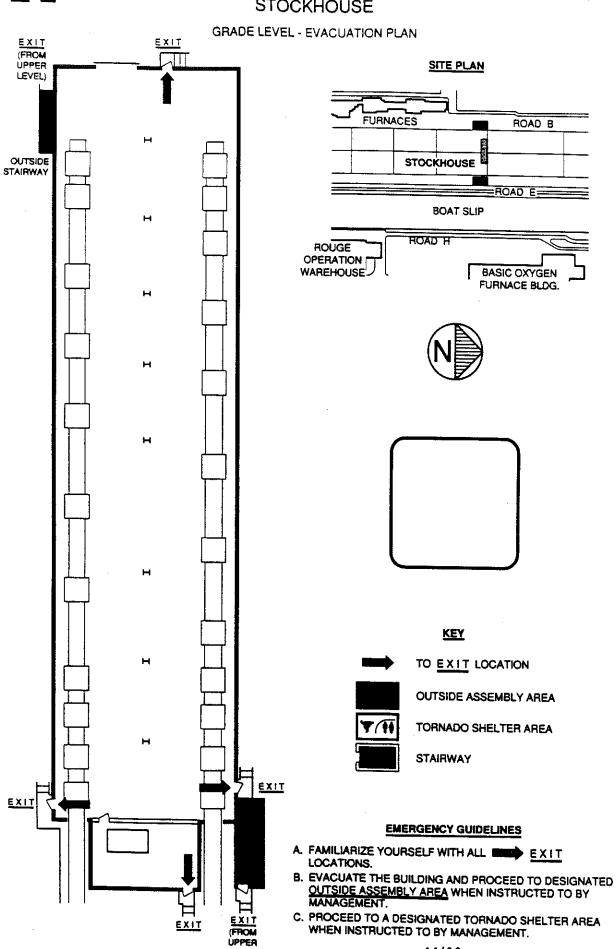
OUTSIDE ASSEMBLY AREA



TORNADO SHELTER AREA (LOCATED ON GRADE LEVEL)

STAIRWAY

STOCKHOUSE



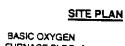
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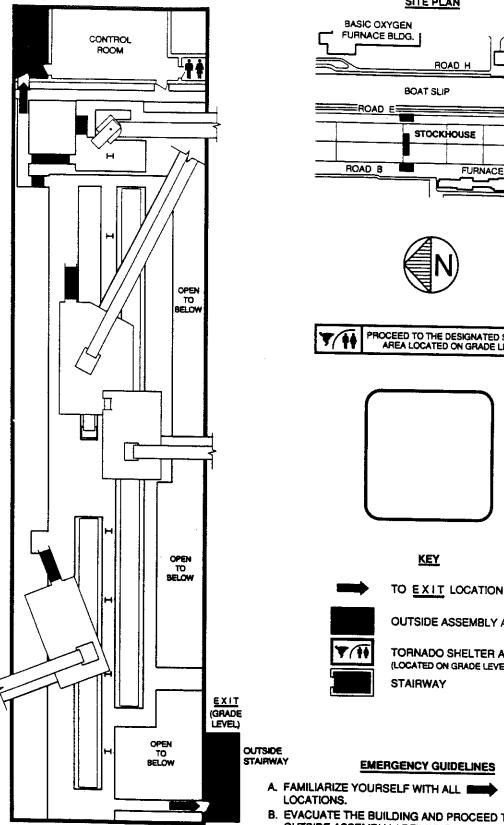
ROU741

STOCKHOUSE

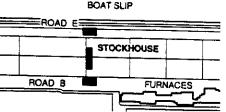
SHUTTLE FLOOR - EVACUATION PLAN

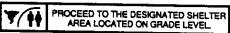
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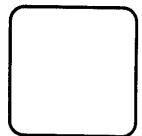




ROUGE OPERATION WAREHOUSE







OUTSIDE ASSEMBLY AREA

TORNADO SHELTER AREA (LOCATED ON GRADE LEVEL)

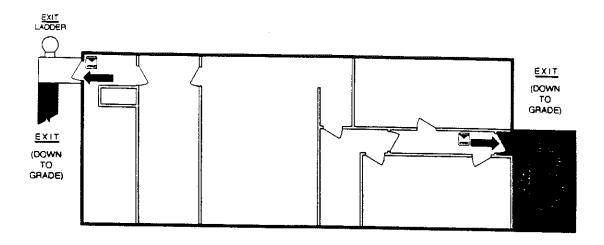
- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

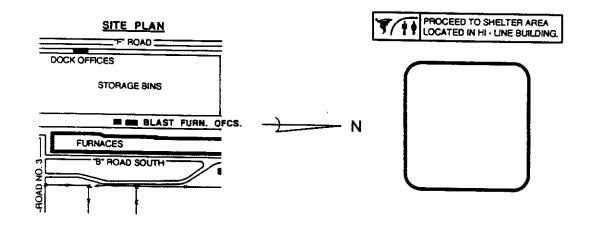
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BLAST FURNACE AREA OPERATION OFFICES

SECOND FLOOR - EVACUATION PLAN





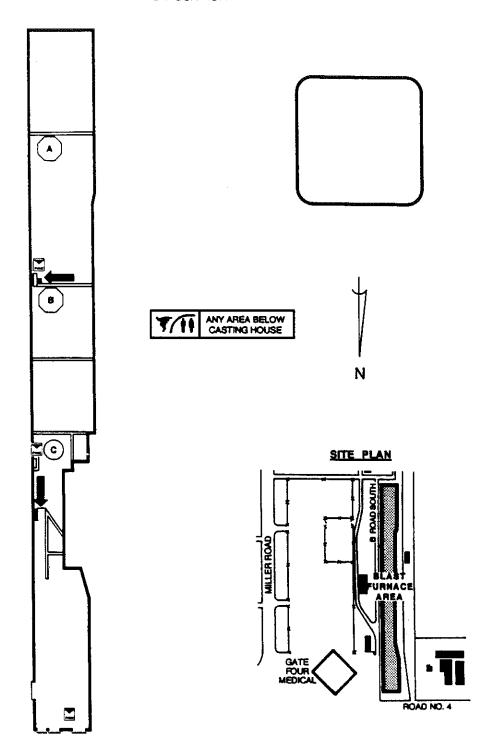
EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY 1/98 1-800-854-FIRE(3473)

BLAST FURNACE AREA

EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

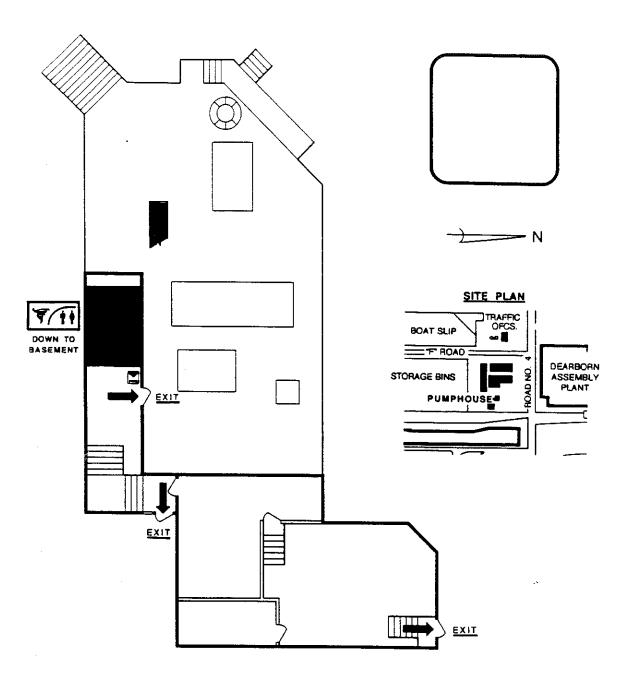


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ROU741 1-600-854-FIRE(3473) COPYNIGHT ©1997 FRE SAFETY DISPLAYS CO.

BLAST FURNACE WASTE WATER TREATMENT PUMPHOUSE

EVACUATION PLAN



EMERGENCY GUIDELINES

- A FAMILIARIZE YOURSELF WITH ALL TO LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT

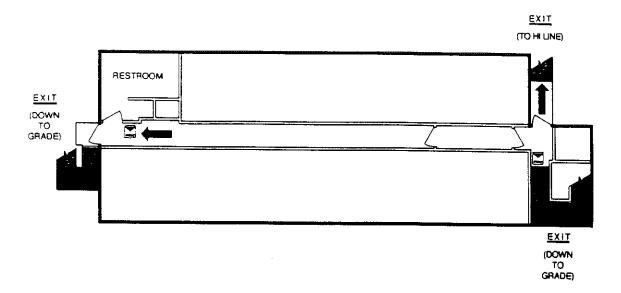
FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY

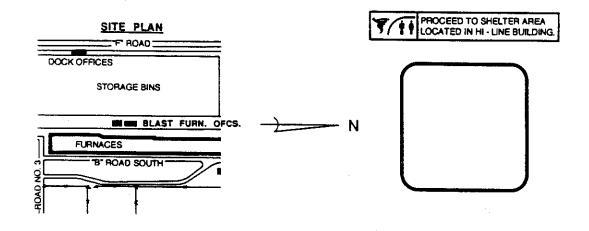
1/9 8 ROU741 1-800-854-FIRE(3473) CONTRACT COLORS THE CACCETY DICES AVE OF



BLAST FURNACE AREA OPERATION OFFICES

THIRD FLOOR - EVACUATION PLAN





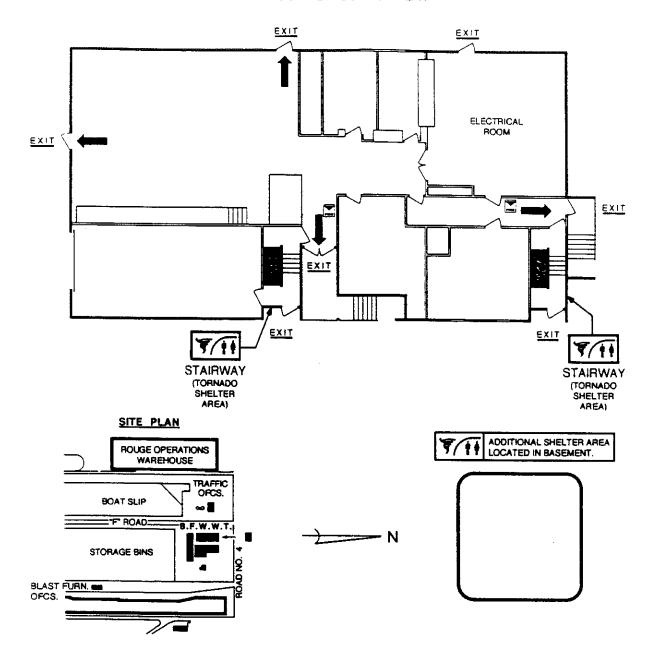
EMERGENCY GUIDELINES

- A FAMILIARIZE YOURSELF WITH ALL
- 8 KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED QUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT

FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY 1/9 8 1-600-654-FIRE(3473)

BLAST FURNACE WASTE WATER TREATMENT

FIRST FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT

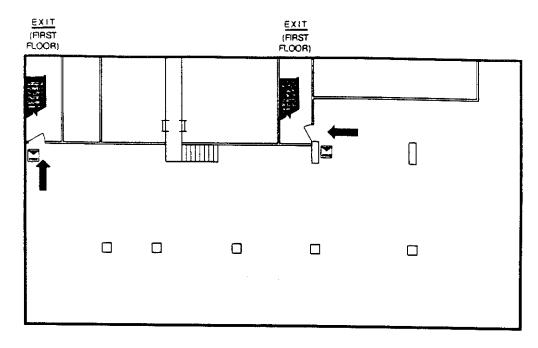
FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY

1/98 ROU741 1-800-854-FIRE(3473)

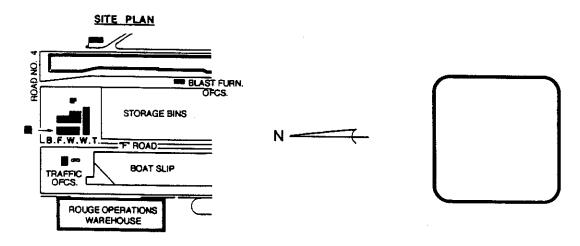


BLAST FURNACE WASTE WATER TREATMENT

BASEMENT - EVACUATION PLAN







EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

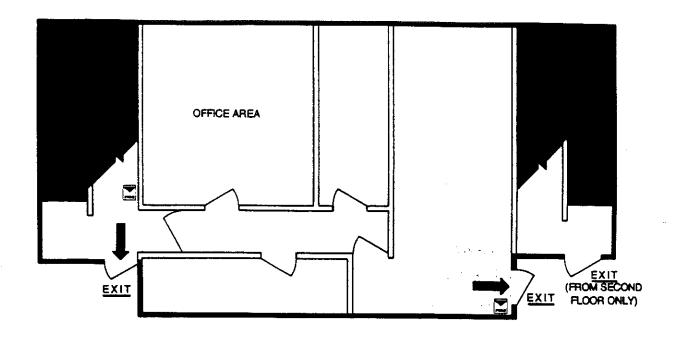
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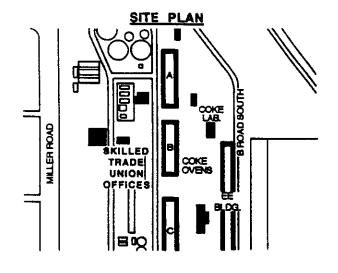
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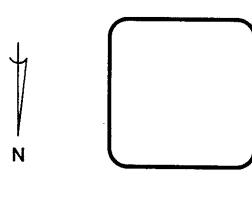


SKILLED TRADES UNION OFFICES

FIRST FLOOR - EVACUATION PLAN







EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- 7. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

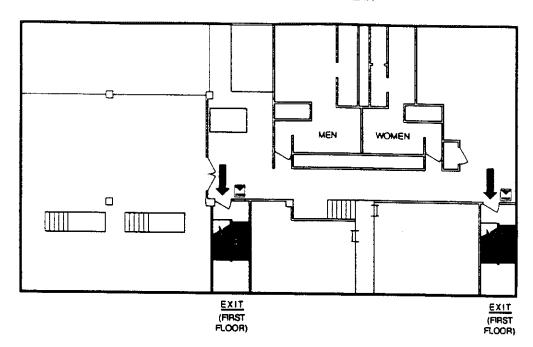
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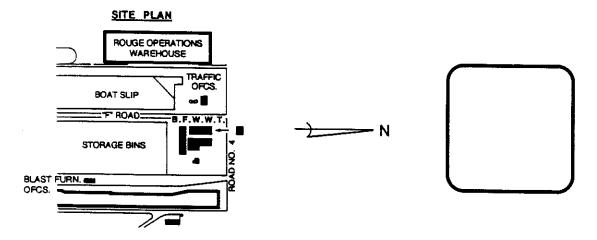
BLAST FURNACE `

WASTE WATER TREATMENT

SECOND FLOOR - EVACUATION PLAN







EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

<u>KEY</u>



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

ROU741

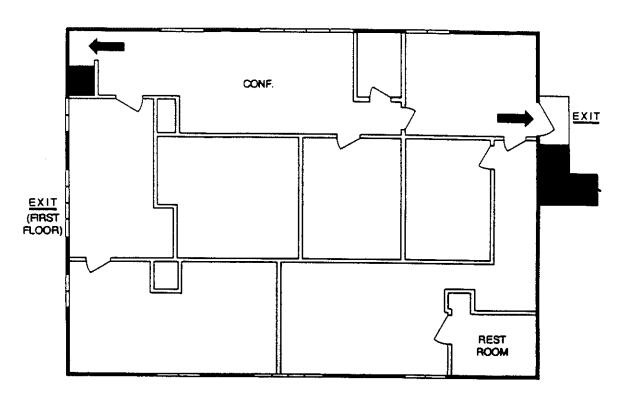
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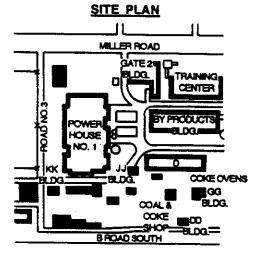


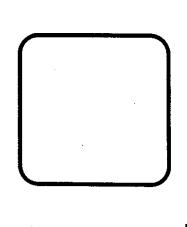
ROUGE STEEL COMPANY KK BUILDING

OPERATIONS OFFICES - SECOND FLOOR

EVACUATION PLAN











KEY

■ TO E

TO EXIT LOCATION

EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

1-800-854-FIRE(3473)

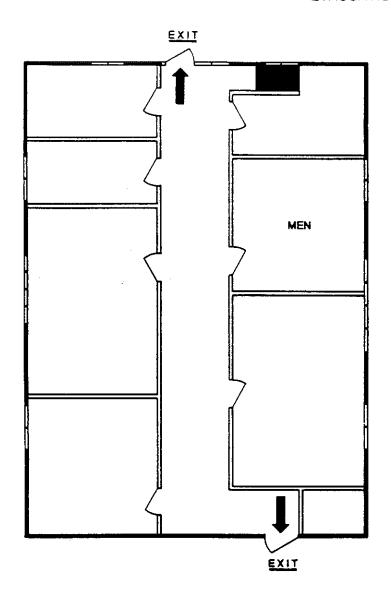
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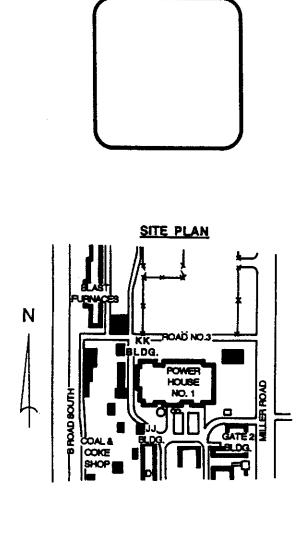


ROUGE STEEL COMPANY KK BUILDING

OPERATIONS OFFICES - FIRST FLOOR

EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

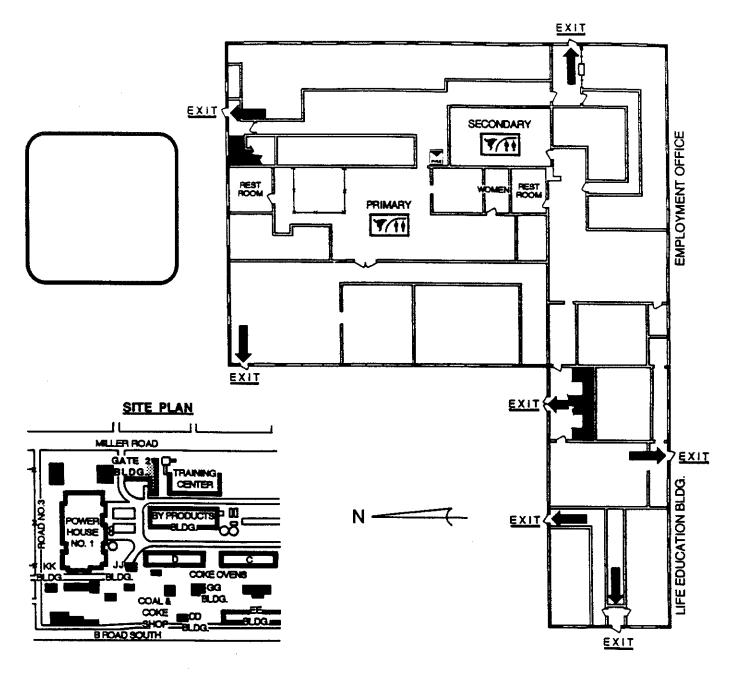
7/96

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GATE 2 BUILDING

FIRST FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

<u>KEY</u>



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

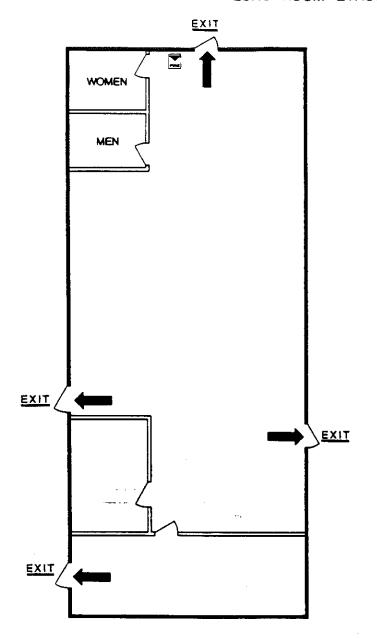
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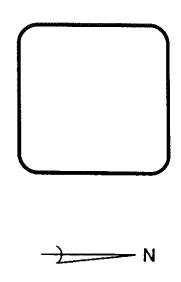
1-800-854-FIRE(3473) COPYRIGHT ©1996 FIRE SAFETY DISPLAYS CO.

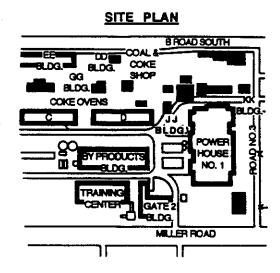


JJ BUILDING

LUNCHROOM - EVACUATION PLAN







EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



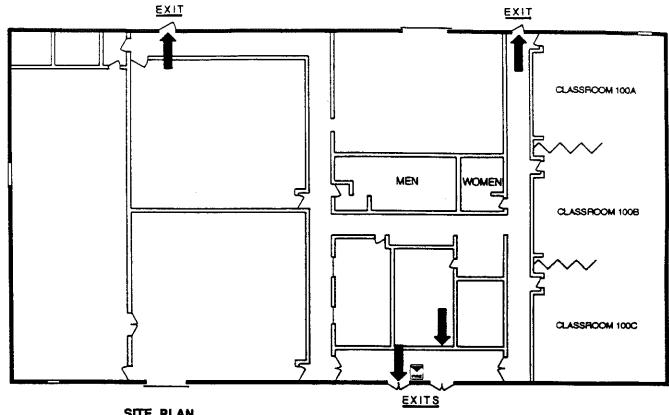
OUTSIDE ASSEMBLY AREA

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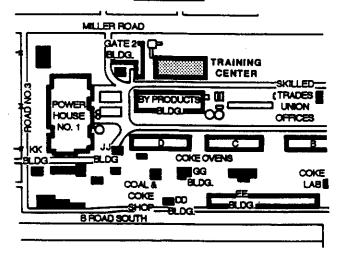


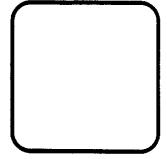
TRAINING CENTER

EVACUATION PLAN



SITE PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



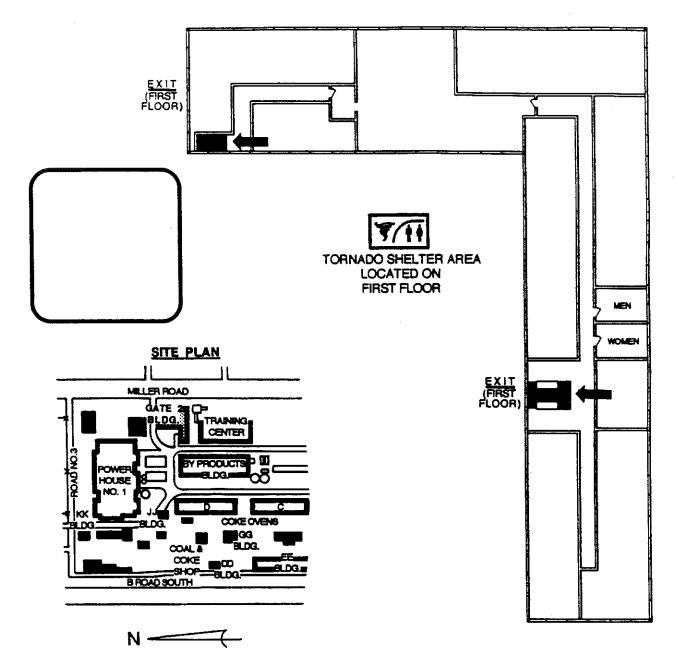
OUTSIDE ASSEMBLY AREA

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GATE 2 BUILDING

SECOND FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

<u>KEY</u>



FIRE ALARM PULL BOX (LOCATED ON FIRST FLOOR)



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

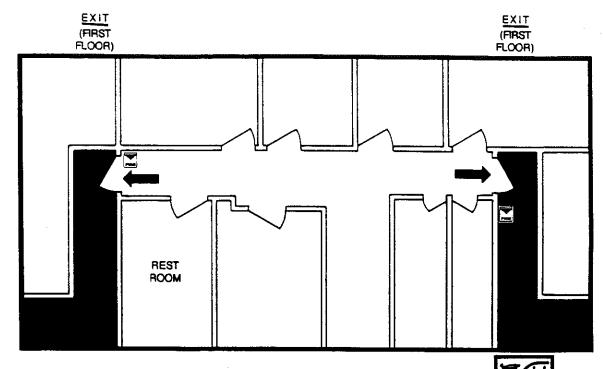
7/96

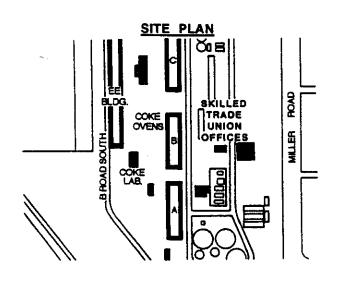
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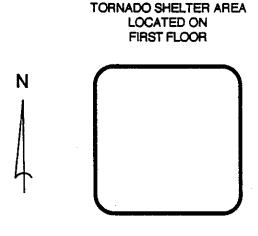


SKILLED TRADES UNION OFFICES

SECOND FLOOR - EVACUATION PLAN







EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



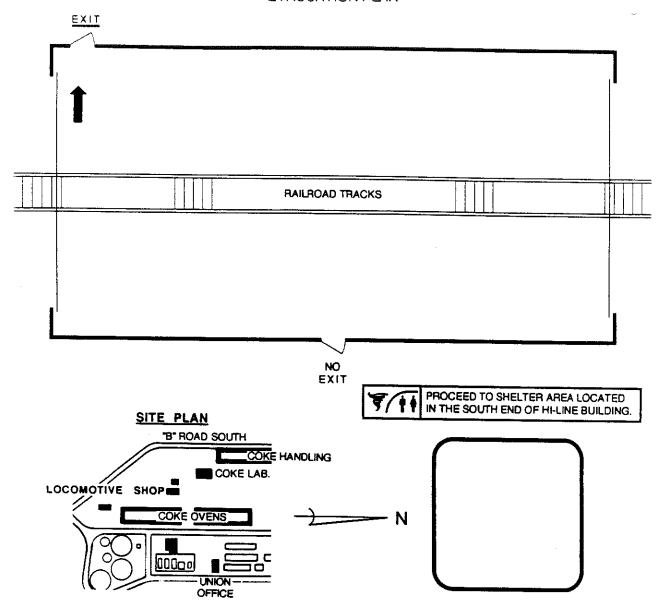
STAIRWAY

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COKE OVEN AREA LOCOMOTIVE SHOP

EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY **MANAGEMENT**
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



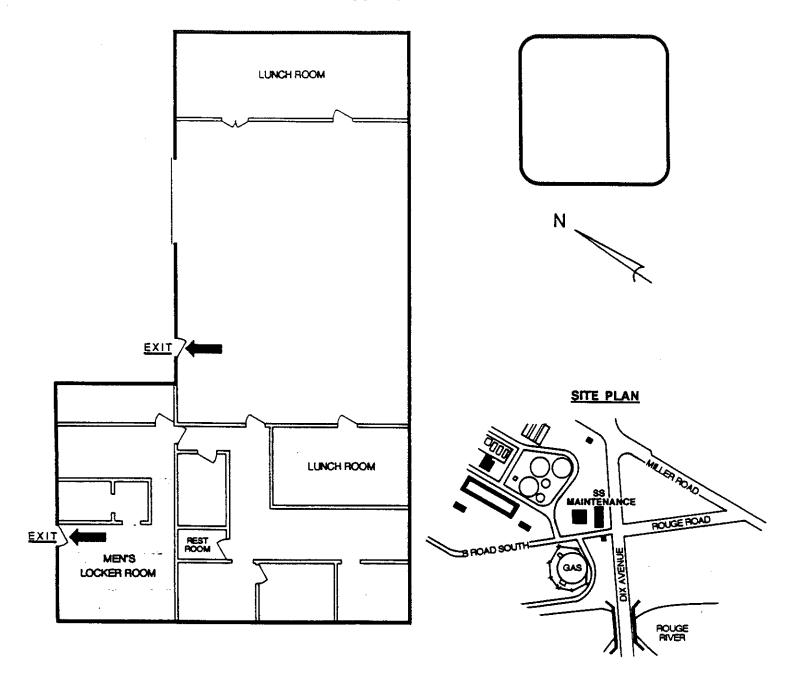
OUTSIDE ASSEMBLY AREA

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SS MAINTENANCE

EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MANY EXIT LOCATIONS.
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



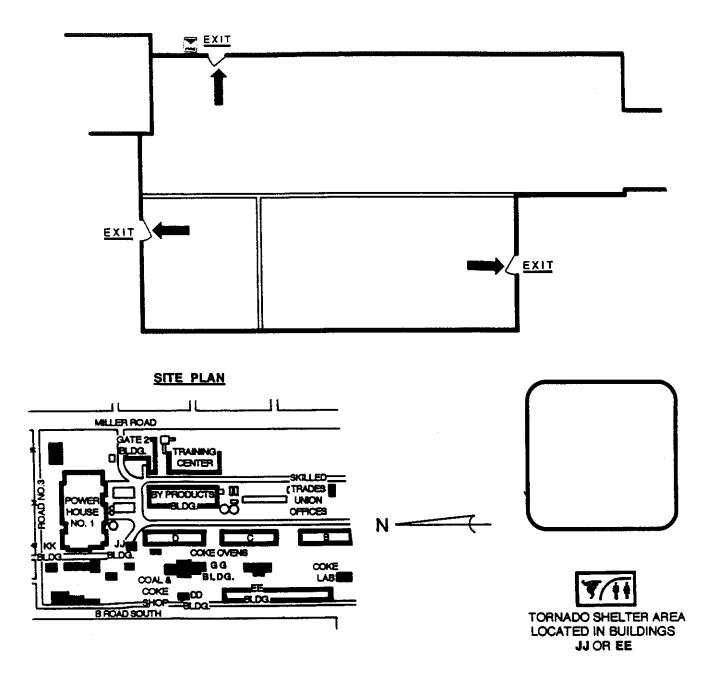
OUTSIDE ASSEMBLY AREA

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GG BUILDING

BREAKER BUILDING - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED **OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY** MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



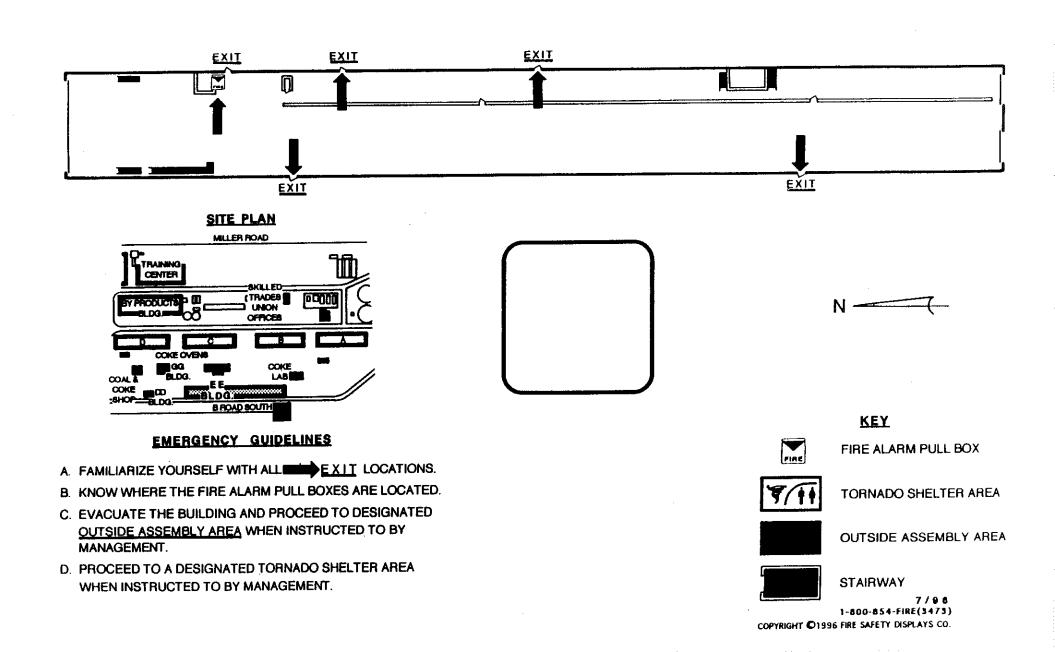
OUTSIDE ASSEMBLY AREA

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EE BUILDING

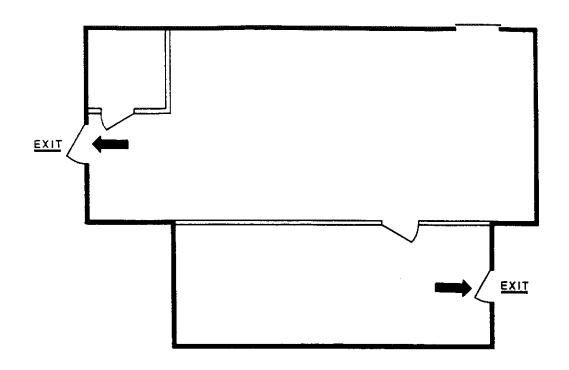
COKE UNLOADING & HANDLING - EVACUATION PLAN

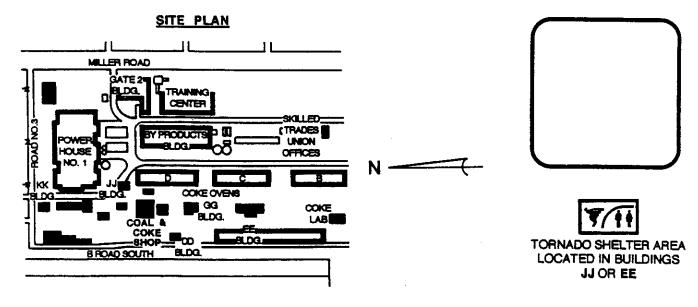




COAL & COKE SHOP

EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALLEMENT EXIT LOCATIONS.
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

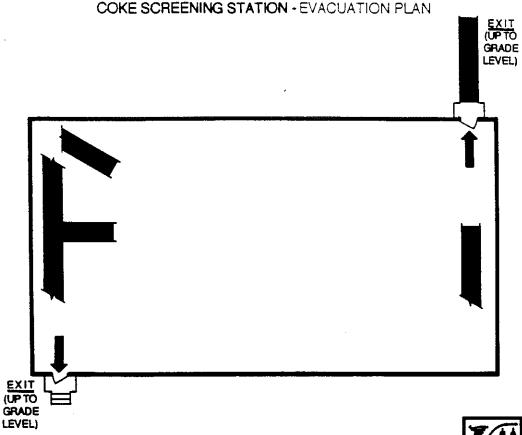
7/96

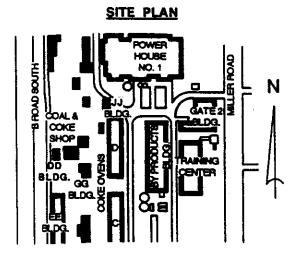
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DD BUILDING

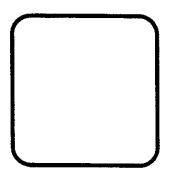




EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MANY EXIT LOCATIONS.
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.





KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

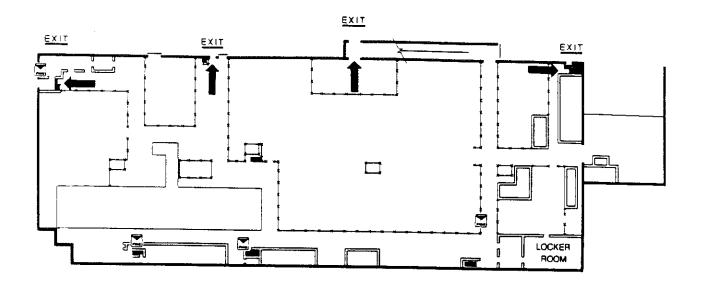
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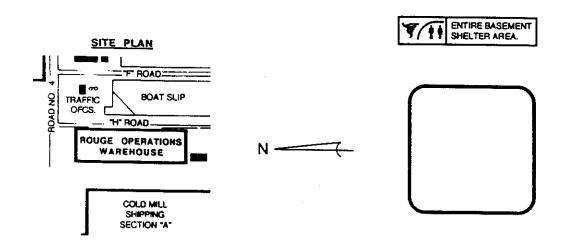
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ROUGE OPERATIONS WAREHOUSE

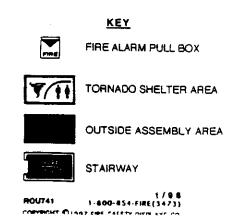
BASEMENT - EVACUATION PLAN





EMERGENCY GUIDELINES

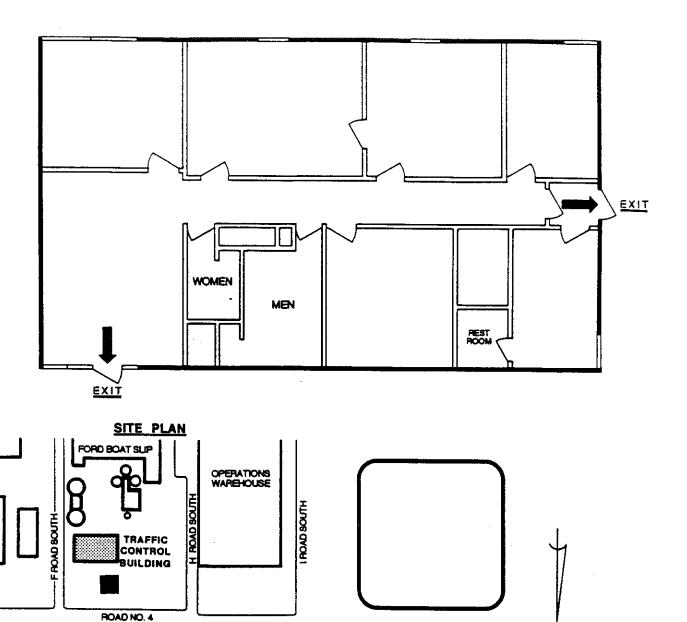
- A FAMILIARIZE YOURSELF WITH ALL
- B KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.





TRAFFIC CONTROL BUILDING

EVACUATION PLAN



EMERGENCY GUIDELINES

ר ר

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY

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TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

7/9

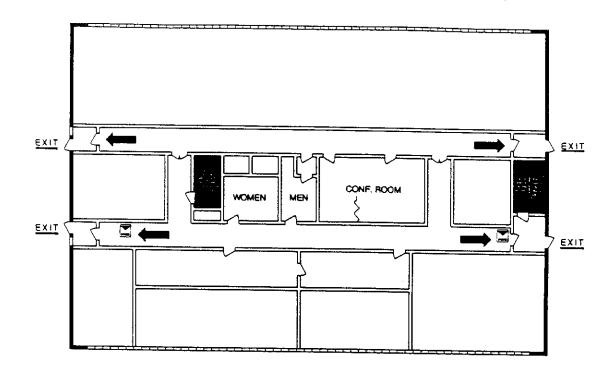
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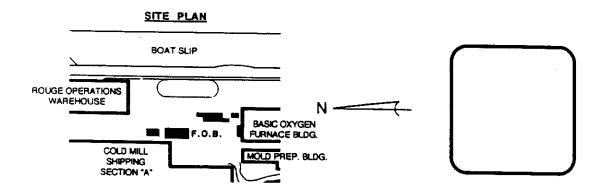
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FINISHING OPERATIONS BUILDING

FIRST FLOOR - EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

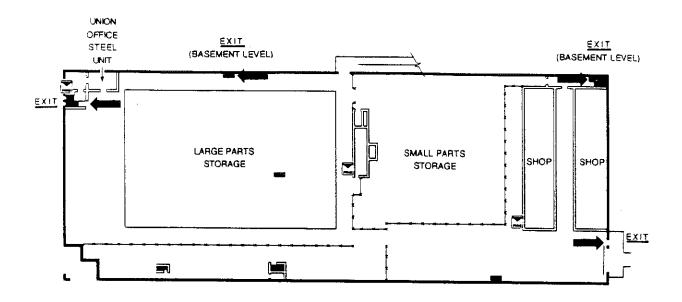
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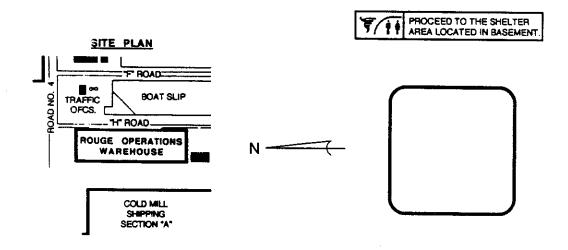
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ROUGE OPERATIONS WAREHOUSE

FIRST FLOOR - EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MEDIE EXIT LOCATIONS.
- B KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA

KEY



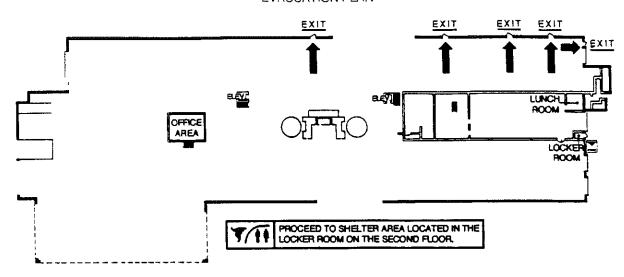
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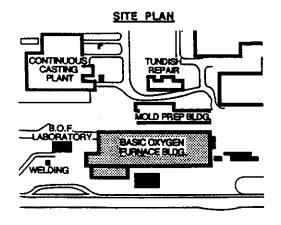


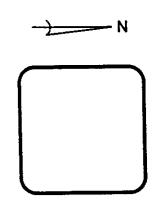
B.O.F. BUILDING

FIRST FLOOR

EVACUATION PLAN

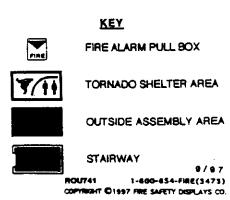






EMERGENCY GUIDELINES

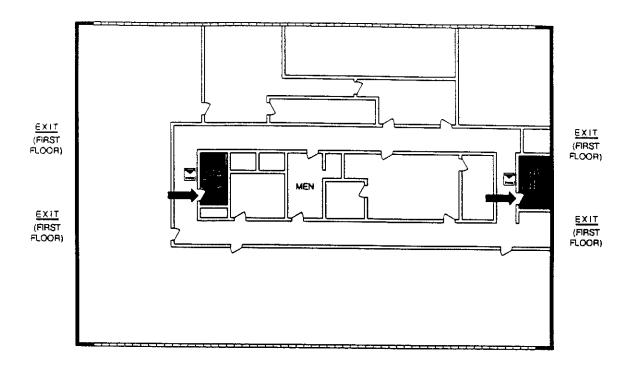
- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- E. DO NOT USE ELEVATORS.

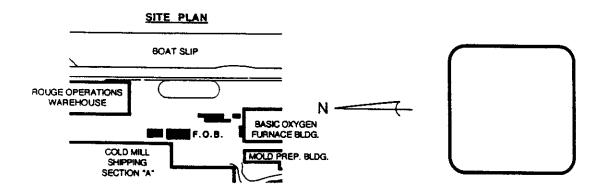




FINISHING OPERATIONS BUILDING

SECOND FLOOR - EVACUATION PLAN





EMERGENCY GUIDELINES

- A FAMILIARIZE YOURSELF WITH ALL
- 8. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

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STAIRWAY

ROUGE STEEL COMPANY

B.O.F. BUILDING

SECOND FLOOR - LOCKER / LUNCH ROOM

EVACUATION PLAN

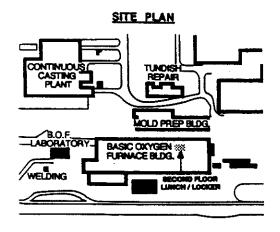
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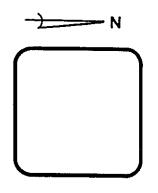
LOCKER
ROOM

COMMITTEE
ROOM

ROOM

STAIRWAY
FRST
FLOOR





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MEDIE EXIT LOCATIONS.
- 8. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- E DO NOT USE ELEVATORS.

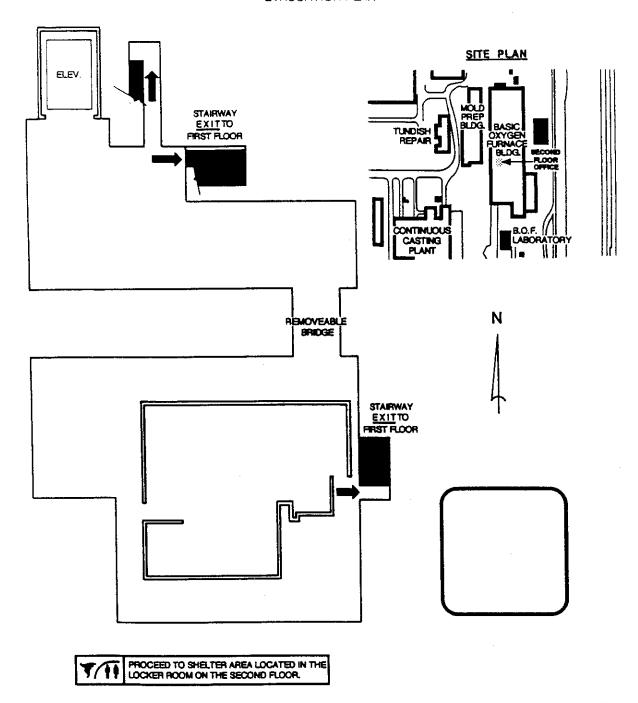
FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY 9 / 9 7 ROUT41 1-800-854-FIRE(3473) COPTRIGHT O 1997 FIRE SAFETY DESPLAYS CO.



ROUGE STEEL COMPANY B.O.F. BUILDING / LADLE REPAIR

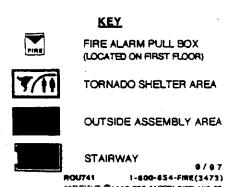
SECOND FLOOR - OFFICE

EVACUATION PLAN



EMERGENCY GUIDELINES

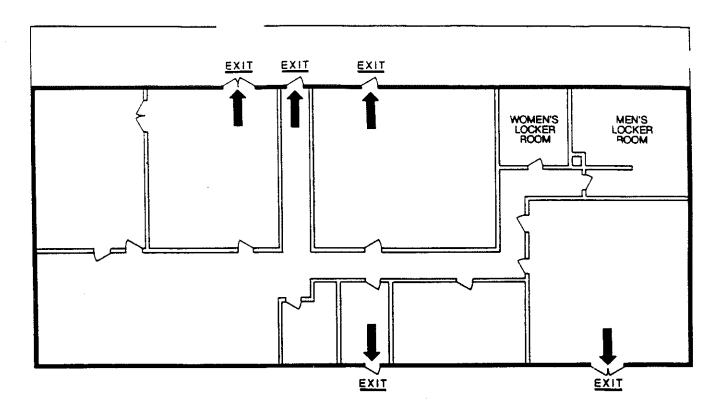
- A. FAMILIARIZE YOURSELF WITH ALL MANY EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- E DO NOT USE ELEVATORS.

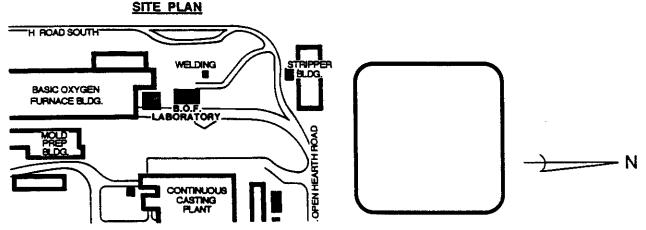




B.O.F. LABORATORY.

EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

<u>KEY</u>



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

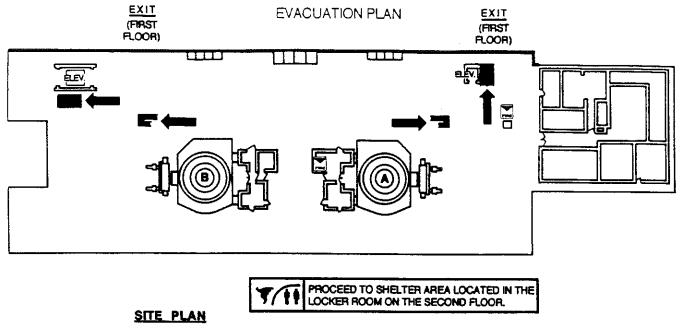
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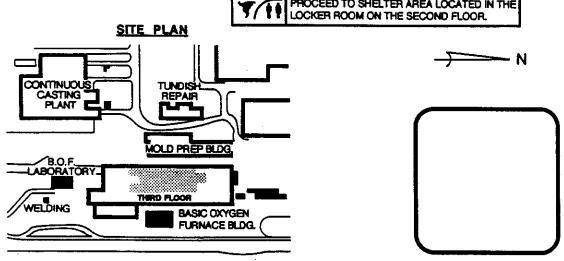
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ROUGE STEEL COMPANY **B.O.F. BUILDING**

THIRD FLOOR





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MEDIE EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- E DO NOT USE ELEVATORS.



KEY

FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

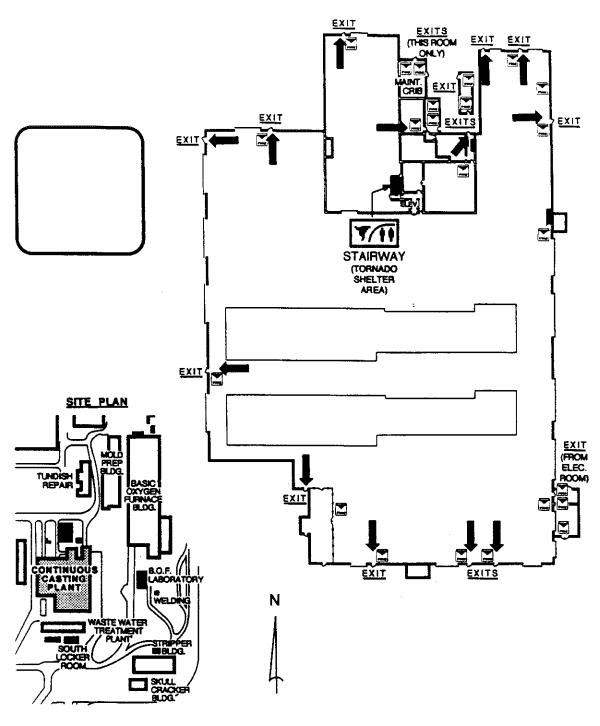
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CONTINUOUS CASTING PLANT

FIRST FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MANY EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



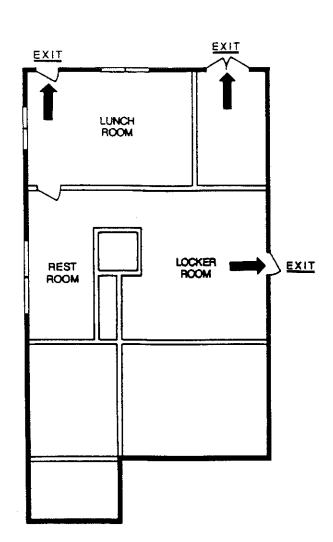
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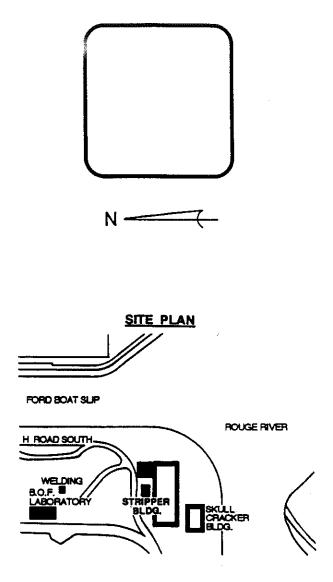
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STRIPPER BUILDING

EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

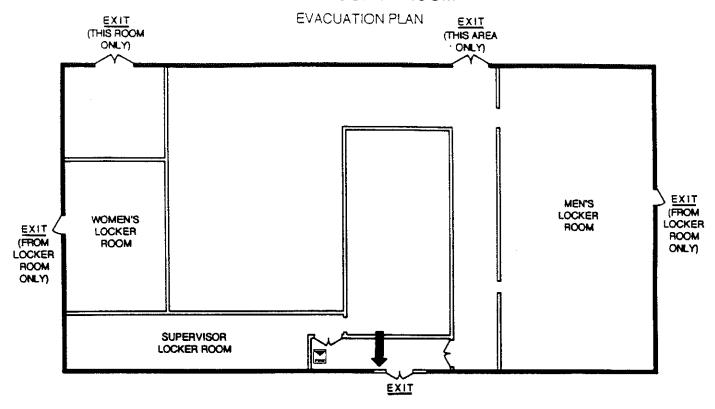
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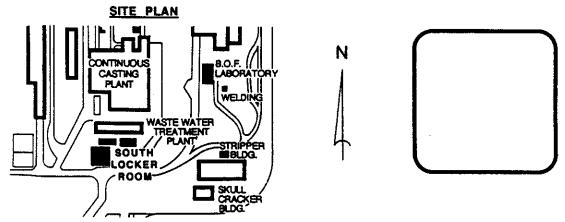
7/96



ROUGE STEEL COMPANY CONTINUOUS CASTER

SOUTH LOCKER ROOM





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOX IS LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



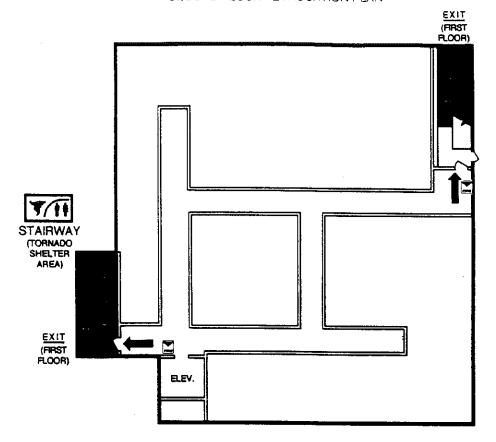
OUTSIDE ASSEMBLY AREA

3/97

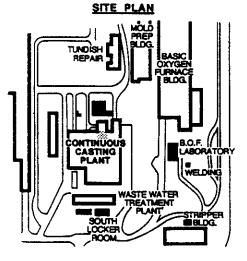
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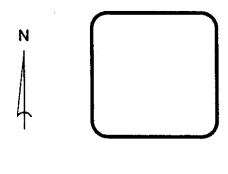
CONTINUOUS CASTING PLANT

SECOND FLOOR - EVACUATION PLAN









EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL BEATT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

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KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

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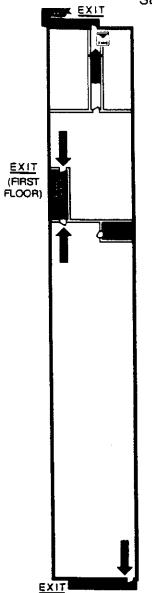
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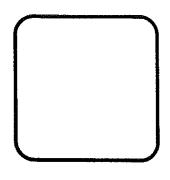


ROUGE STEEL COMPANY CONTINUOUS CASTER

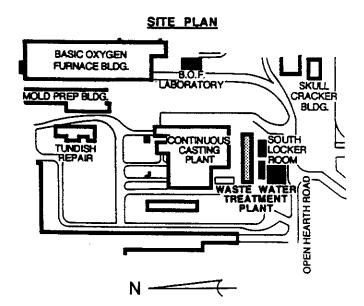
WASTE WATER TREATMENT PLANT

SECOND FLOOR - EVACUATION PLAN









EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

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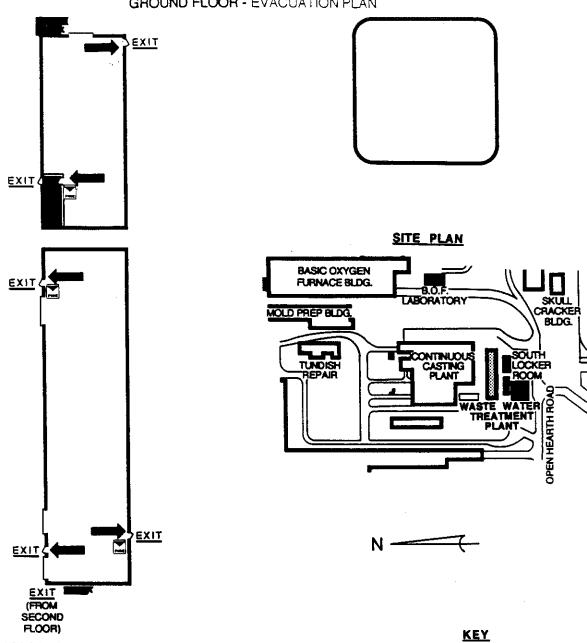
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ROUGE STEEL COMPANY CONTINUOUS CASTER

WASTE WATER TREATMENT PLANT

GROUND FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL MENDE EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

FIRE ALARM PULL BOX



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA

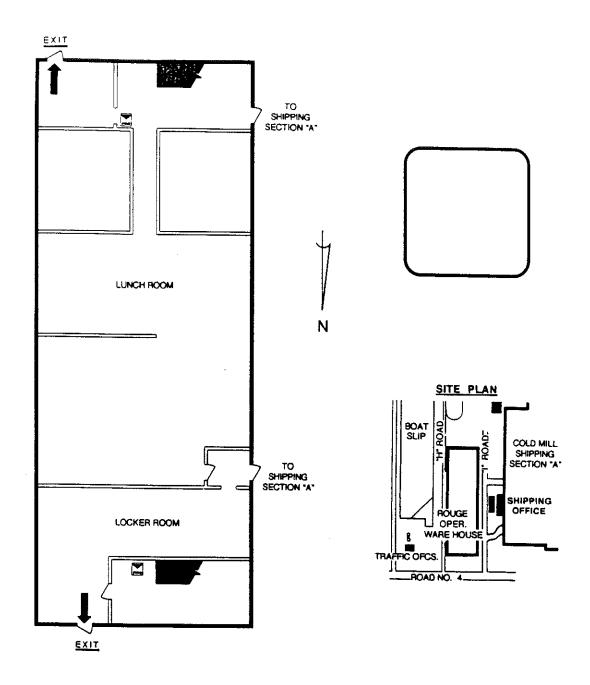


STAIRWAY

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COLD MILL SHIPPING OFFICE BUILDING

FIRST FLOOR - EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

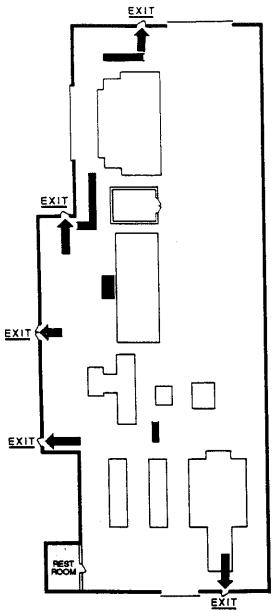
FIRE ALARM PULL BOX TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY

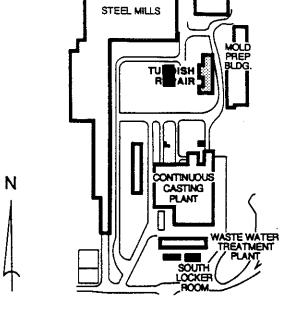


ROUGE STEEL COMPANY CONTINUOUS CASTER

TUNDISH REPAIR

EVACUATION PLAN





SITE PLAN

EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.





TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

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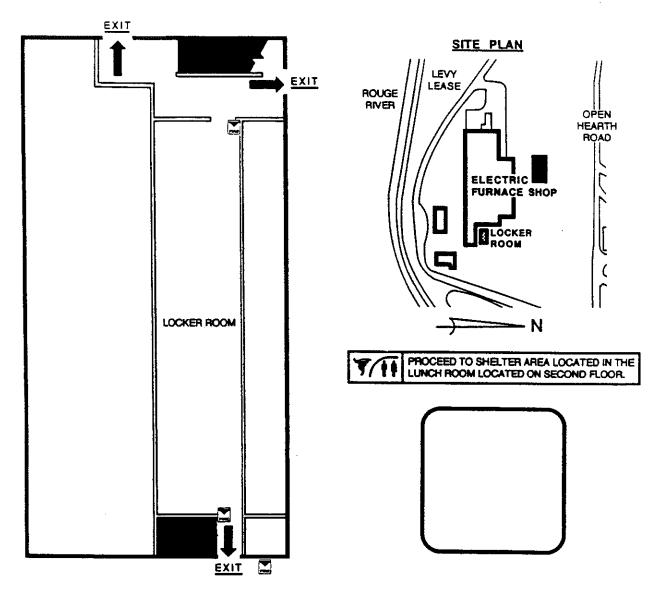
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ROUGE STEEL COMPANY ELECTRIC FURNACE SHOP

FIRST FLOOR / LOCKER ROOM

EVACUATION PLAN



EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL EXIT LOCATIONS.
- B. KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED QUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

TORNADO SHELTER AREA OUTSIDE ASSEMBLY AREA STAIRWAY

KEY

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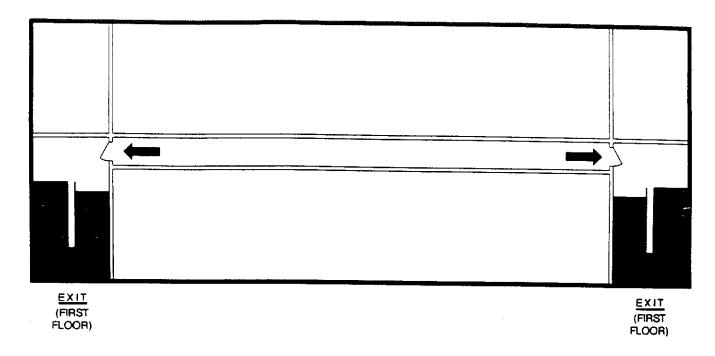
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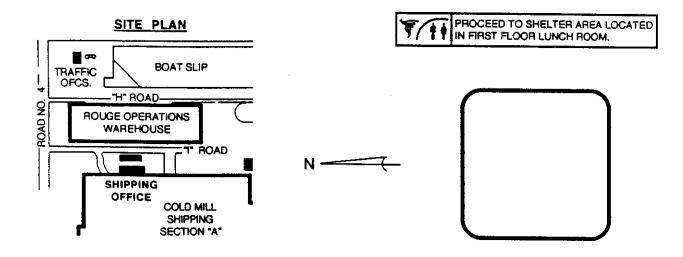
ROUGE STEEL COMPANY

COLD MILL

SHIPPING OFFICE BUILDING

SECOND FLOOR - EVACUATION PLAN





EMERGENCY GUIDELINES

- A. FAMILIARIZE YOURSELF WITH ALL
- B KNOW WHERE THE FIRE ALARM PULL BOXES ARE LOCATED.
- C EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- D PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT

KEY



FIRE ALARM PULL BOX (LOCATED ON FIRST FLOOR)



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

ROU741

1 / 9 8 1-800-854-FIRE(3473)

OPTIONAL FORM 99 (7-90) Dease, Comment - Thanks FAX TRANSMITTAL ROUGE STEEL

FACILITY NAME:

USEPA ID NO:

FACILITY ADDRESS:

3001 Miller Rd., Dearborn, MI 48121

FACILITY TYPE:

Large Quantity Generator

FACILITY REPRESENTATIVE:

Donald S. Windeler, P.E., Manager -Environmental Engineering Department

Lowell T. Potvin, Environmental Engineer, Environmental Engineering

Department

DRAFT & ENFOR

USEPA INSPECTOR:

Diane Sharrow Sheila O'Connor

James Gale

DATE OF INSPECTION:

USF&WS SPECIAL AGENTS:

October 20, 1999

The inspection was conducted to assist in determining whether birds and wildlife were being killed or adversely affected by solid waste generated by Rouge Steel Company and managed in the oil polishing lagoons and sludge lagoons (See Attachment A -January 15/1)1997, Map entitled Power Facility Locations).

Special Agents O'Connor and Gale, and Inspector Sharrow, arrived at Gate 3 of the site at approximately 7:30 am and were directed to the Visitor's Parking Lot. After presenting our credentials to security, we were put in contact with Mr. Windeler. We met with Mr. Windeler at approximately 7:45 am and explained the purpose of the inspection. He was upset by the unannounced nature of our inspection because it conflicted with a U.S. EPA EPCRA inspection scheduled for that day. He asked us to return on another day. We insisted on seeing the lagoons that day. After additional discussion with Mr. Windeler, he rearranged his schedule and took us out in a Company van to the oil polishing lagoons west of Schaeffer Road and south of Butler Road.

Special Agents O'Connor and Dale proceeded to walk the perimeter of the oil polishing lagoons. The two lagoons consist of the oil polishing lagoon and the supplemental oil polishing lagoons. There are also two oil skim clarifiers and a sludge lagoon at the site. The two lagoons had steep embankments with some rip rap. The embankments were stained with oil. Oil was present on the surface of both lagoons. Several booms were also present that were in fair condition. Buffalo Grass, Cattail, daisies, thistle, goldenrod, queen Anne's Lace and other vegetation were present on the banks of both lagoon. A belt skimmer was in place on the oil polishing lagoon. $\mathcal{C}(MR)$

Pat Gurly, a Rouge Steel maintenance/waste water treatment employee, was present at the "silo" were the oil recovered by the belt skimmer is recovered and pumped out. He said goose and heron have been found oiled at the ponds and were recovered and sent to the City of Dearborn for rehabilitation. He thought that there had also been oiled bird remains recovered when the silo was pumped out. He thought that Tom Barstow, one of the waste water treatment operators (?) Might know more specifics on where birds had been sent.

I proceeded to ask Mr. Windeler about Mr. Barstow's comments, the lagoons and Rouge Steel Company's operations. He stated he had been at Rouge Steel for approximately three years and he had no direct complaints regarding oiled wildlife. He said that the water flowed from the oil skim clarifiers to the oil polishing lagoon and then to the supplemental oil polishing lagoon. Water was observed to be flowing north. About this time, Special Agent Gale located an oiled wing near the base of the silo. Some feathers were also recovered immediately north of the silo. These bird remains were bagged and tagged as evidence by the USF&WS.

Mr. Lowell Potvin then arrived at the site. Mr. Windeler stated that Mr. Potvin would accompany us on the remainder of our inspection, so he could go to the EPCRA inspection. Mr. Potvin stated he had been a water quality engineer for 25 years, the last 10 with Rouge Steel concentrating on environmental engineering. I asked him about Mr. Gurly's comments. He said that the most recent bird mortality he was aware of, was that an egret had been found oiled in the sludge. He also stated that an occasional goose had nested in the area. He provided the phone number 943-2077 for the animal shelter/wildlife recovery center where the egret was sent.

Mr. Potvin also told me that the Rouge River had been rerouted a number of years ago. The River formerly flowed along the lines of the Supplemental Oil Polishing Lagoon which accounted for its "shape". He also said that when the oil polishing lagoon was constructed, the gravelly banks attracted kildeer and hosted a rookery of arctic terns for several summers.

We continued our discussions as we followed Special Agents O'Connor and Dale around the banks of the Supplemental Oil Polishing Lagoon. The Supplemental Oil Polishing Lagoon had little or no flow. Mr. Potvin stated that the skimmers were not very effective in the Supplemental Oil Polishing Lagoon because of the low levels of oil and lack of flow. He stated that oil is vacuumed directly off this Lagoon as necessary. There is a lift pump that can be used to pump water to the clarifiers.

Mr. Potvin speculated that both Lagoons were 6 to 10 feet in depth. He also said that Rouge Steel had changed to a nonemulsified oil to aid recovery. Mr. Potvin also told me that when the power house exploded at the Rouge complex, the previous spring, oil had been discharged directly to the ponds. He also said that the last time the lagoons had been dredged, the sludge was placed in the Sludge Lagoon. About this time we all drove over to the Oil skimmers. Mr. Potvin said that they had aerated the two smaller sludge ponds adjacent to the skimmers for odor control due to complaints from area residents. The sludge ponds overflow back to the clarifiers. The smaller sludge ponds are pumped down one at a time, mixed with lime and dredged. exited Rouge Steel's property through a gate in the fence and walked along the channelized cement embankments looking for evidence of injured birds and wildlife. Numerous small birds were seen in the trees and heavy vegetation along the River. then drove to the Sludge Lagoon. It is almost unseen due to the trees and vegetation that surround the Lagoon. A large number of small birds were observed in this area. The Sludge Lagoon contained / contained little or no water. Mr. Potvin thought it was due to the limited precipitation during the past few month s and low levels of water in the Great Lakes and the surrounding area.

We then drove along the River Front Rod to the Oil Polishing Lagoon or Pond 12 A east of the Electric Furnace. Mr. Potvin explained that the Lagoon contained only non-contact cooling water. The Lagoon contained a small amount of stagnant water. Limited vegetation existed between the perimeter of the road and the Lagoon and the River. No wildlife or oil was observed in the area.

Mr. Potvin also drove us offsite to a pond owned by the Darling Company that is across the river from the oil polishing lagoons. A mallard hen and several drakes were present on the pond. No oil was seen.

We then returned to Mr. Windeler's Office. Special Agents O'Connor and Dale, and I conferred privately for a few minutes. We then spoke briefly with Mr. Potvin. W told him that he would receive copies of all the photographs taken by Special Agent O'Connor, and that both agencies would contact Rouge Steel Company in the future about what might need to be done at the Lagoons. We departed at approximately 11:15 am.

Since the inspection, special Agent O'Connor has contacted the telephone number provided by Rouge Steel where birds have purportedly been sent for recovery. According to a voice mail message from Ms. O'Connor, the "center" is not run by the City of Dearborn. I am waiting on more information from Ms. O'Connor regarding how many birds may have been sent by Rouge Steel to this "rehabilitator", as well as copies of the photographs and any analysis completed on the bird remains.

Conclusion. It is the USEPA inspector's professional opinion that an ecological risk assessment would clearly indicate that the oil polishing lagoons at Rouge Steel do present both a acute and chronic risk to birds, and thus an imminent and substantial endangerment.

This conclusion is supported by information found on the USEPA Intranet Website on Imminent and Substantial Endangerment Authorities that at least one RCRA 7003 Order has been issued based on similar risks, not excluding drowning, toxicosis and hypothermia, even though no birds were recovered or found. Keep in mind that dead or dying oiled birds have been estimated by USFWS to sink or dissolve in approximately four days.

Whether these risks are addressed under a RCRA 7003 Order or a possible Supplemental Enforcement Project as part of the ongoing multi-media judicial action being taken by USEPA Region 5, needs to be discussed with Regional Counsel. A determination on what action should be taken, needs to be made as soon as possible, if any USEPA wants Rouge Steel to take deterrent actions before the spring where the greatest number of migrating and breeding birds could be adversely affected. Based on the size and configuration of the lagoons, a number of different deterrent techniques could be employed by Rouge Steel to address these risks.

NOTE: This report is draft, interim and Preliminary. It may be incomplete. It may contain unreviewed materials, concepts and conclusions. It may not contain reference to all relevant information or potential violations identified, suspected or under investigation. Follow-up information and analysis may be required. It may or may not reflect the final conclusions or positions of the USEPA. Never the less, the information contained herein, is confidential and enforcement sensitive, and may be privileged and should not be release in any way without careful consideration and consultation with the USEPA staff and counsel. This draft should not be copies or distributed, and should be destroyed when the final inspection report is produced.

Attachments

cc: O'Connor Dale

cc: Vasaturo
Maloney
Valentino
Little
Jereza
Sharrow
File

Mark Moloney 10/06/99 03:20 PM

To:

Diane Sharrow/R5/USEPA/US@EPA

CC:

Subject: Re: Rouge Steel

Diane:

I'm not sure the diagram in our MM report shows the Shaeffer Road Wastewater Treatment Plant (WWTP) . I have scanned a larger map the plant which shows the ponds at the WWTP in the southwest corner between Schaeffer Road and the Rouge River. This map is attached:



rouge

The environmental contact at the plant is Donald S. Windeler, Manager Environmental Engineering. His telephone number is 313-845-3217. If you arrive at the plant unannounced go to the security office in the Rouge Office Bldg. I think its at gate 5D. Ask for Windeler. The Rouge Office Bldg. is shown on the Figure 1 map you got from Gaylene.

We have been typically announcing the MM inspections about a week in advance, however, when we did Rouge we went in unannounced to do the TSCA PCB portion of the inspection.

Hope this helps ---- Mark

Diane Sharrow



Diane Sharrow 10/06/99 01:27 PM

To: CC:

Mark Moloney/R5/USEPA/US@EPA Gaylene Vasaturo/R5/USEPA/US@EPA

Subject: Rouge Steel

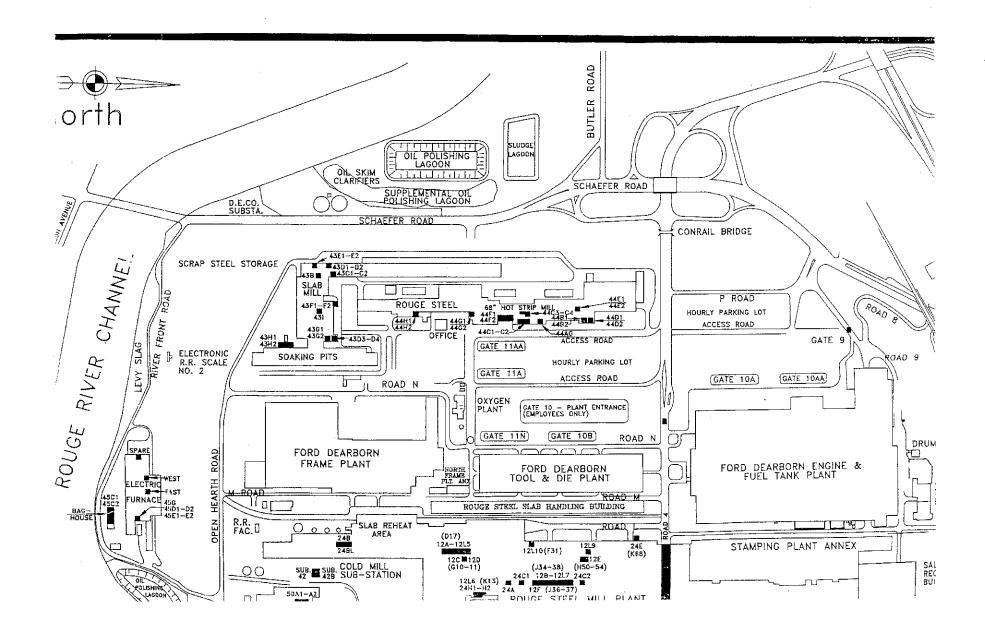
Mark,

Thank you for your earlier messages on Rouge Steel. Gaylene is sending me a copy of Figure 1 - the Rouge Steel site map. Do you have a more deatiled map(s) showing all the ponds?

We tenatively expect to visit the site October 19 - we would like to start around 6:30 am (when waterfowl is most active during the migration season). Do you have any advice on where to register/announce our presence and a contact name. Evidently, Fish and Wildlife Service has broader authorities than we do under RCRA 3007 as far as site access, but I would feel more comfortable if we could follow the "standard" EPA protocol for announcing our visits.

Thanks

Diane Sharrow





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE - 9 J

FACSIMILE and CERTIFIED MAIL RETURN RECEIPT REQUESTED

JoAnn Merrick, Chief Enforcement Program Section Waste Management Division Department of Environmental Quality State of Michigan P.O. Box 30241 Lansing, MI 48909-7741

Re: Notice Pursuant to Section 7003 of RCRA

U.S. EPA Identification Number MID 087 738 431

Dear Ms. Merrick:

This letter serves notice that the United States Environmental Protection Agency is proposing to issue a unilateral Order under Section 7003(a) of the Resource Conservation and Recovery Act as amended, 42 U.S.C. § 6973(a) to Rouge Steel Company, in Dearborn, Michigan. The Order requires Rouge Steel Company to continue to take emergency measures to stop the exposure of wildlife, including migratory birds, to solid waste located in the oil skim clarifiers, sludge lagoon and oil polishing lagoons on their property.

If you have any questions regarding this matter, please feel free to contact me at (312) 886-4434.

Sincerely yours,

Joseph M. Boyle, Chief Enforcement and Compliance Assurance Branch

cc: Vasaturo, ORC
 Sharrow, WPTD-ECAB
 Black, WPTD-ECAB
 Little, WPTD-ECAB

bcc: ECAB Branch Copy
MI/WI Section Copy

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	SECTION CHIEF(S)	ECAB BRANCH CHIEF

DE-9J:DSHARROW:1/21/00 F:\USER\DSHARROW\dsc_st.ltr



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	Attach	nment			



PRE-JOB CONTRACTOR SAFETY REQUIREMENT REVIEW (CSRR)

Date / Time: RSC Operating Area:	Job Name: Purchase Order No.:			
Rouge Steel Representative in Attendance The CSRR items CHECKED OFF below have been disc of each item (as appropriate) have been given to them. This process. Each Contractor has the responsibility to as of his own Employees and Subcontractors. The Contractor	The signatures contained below constitute verification of sure complete Safety and Emergency Response training			
General Safety Requirements	Job Specific Safety Requirements			
Emergency Telephone Numbers 1.0 Security Procedure 2.0 Vehicle Safety 3.0 Smoking Regulations 4.0 Incident/Injury Reporting 5.0 Removal of Wastes, Debris, and Containers 6.0 Housekeeping 7.0 Off-Limit Areas of the Mill 8.0 Contractor Site Access Permit 9.0 Contractor's Safety Record and Training Sub. 10.0 Hazard Communication Program 11.0 Personal Protective Equipment 12.0 Notification to RSC of MIOSHA Visit 13.0 Hazard Notification 14.0 CSRR Contractor Employee Review 15.0 RSC CSRR Audits Area Specific Safety Requirements				
1.0 Emergency Response Plan (ER) 1.1 ER Notification Methods 1.2 ER Evacuation Routes and Assembly 2.0 Operations Hazards 3.0 Chemical Hazards 4.0 Confined Spaces				
Signature of RSC Representative	Signature of Contractor Representative			



ROUGE STEEL COMPANY EMERGENCY TELEPHONE NUMBERS

FIRE:	Rouge Steel/Ford	Fire/Rescue		(313) 32-23313			
SECURITY:	Rouge Steel Secu	ırity		(313) 31-78888			
AMBULANCE:	Ford Fire/Rescue	Ambulance	(313) 32-21133				
Note: All emergency hat decal.	/ telephone numbe	rs listed above are on the	RED	emergency phone nu	ımber hard		
SAFETY:	Rouge Steel Safe Off Shifts/Weeken			(313) 32-24910 (313) 31-78882 - 3			
ENVIRONMENTAL:	Rouge Steel Secu	irity		(313) 31-78882 - 3			
KEY ROUGE STEEL	. EMPLOYEES:						
Donald Winde	ler		313	NUMBER 845-3217			
Lowell Potrin			<u>313</u>	323-1260			
				 			
Note: List names a contacts.	nd telephone num	bers of those Rouge Ste	el Em	ployees who will be	contractor		
KEY CONTRACTOR	EMPLOYEES:						
NAME				NUMBER			

Note: List names and telephone numbers of those contractors who will be contacts.

RT-A1-22-05 SAFETY MARCH 14, 2000



ROUGE STEEL COMPANY (RSC) CONTRACTOR SAFETY REQUIREMENTS REVIEW (CSRR)

GENERAL SAFETY REQUIREMENTS

1.0 SECURITY PROCEDURES

<u>PARKING</u> - Contractors and Contractor employees shall park their personal vehicles only in areas designated for that purpose by Rouge Steel Management. Only Contractor management will be issued vehicle entry passes into the Company's facility.

<u>PERSONNEL REGISTRATION</u> - Contractors working within Rouge Steel shall provide the Rouge Steel Engineer or Project Coordinator overseeing the project with a complete list of all contract personnel working on a particular project. Contractor personnel must carry on their person Contractor and personal identification that clearly establishes their position as an employee or sub-contractor of the contractor. Contractor personnel must show this identification upon request by Rouge Steel security, management or supervision.

<u>TOOL INVENTORY</u> -Each contracting company performing work at Rouge Steel shall provide the Rouge Steel Engineer or Project Coordinator overseeing the project with a general tool inventory (i.e., seven gang boxes, four welders, etc.).

2.0 VEHICLE SAFETY

The plant speed limit is 20 mph and must be observed by all vehicles.

This plant has many large vehicles, which have limited sight-lines and maneuverability. Give them plenty of room and right of way.

The "tunnel" on Road 4 represents a special hazard. There is turning and cross traffic within the tunnel involving large vehicles. Vehicles must have their headlights on when in the tunnel. Traffic lights within the tunnel must be obeyed to permit cross traffic.

Rail traffic includes rail cars carrying liquid iron at 2500° F. Obey crossing signals and give trains the right of way. Do not stop on rails. Do not park on or next to rails.

Boat Slip Road. Roads E and H run along the boat slip close to the water's edge. Care must be taken to drive safely, consistent with visibility and road conditions.

3.0 SMOKING REGULATIONS

Smoking shall be prohibited in all posted areas, all office areas and all enclosed work areas where airborne flammable contaminants are present. This regulation shall be strictly enforced.

The above smoking regulations are to be applied to all jobs as the minimum requirement. Further precautions may become necessary based on individual job circumstances.

4.0 INCIDENT/INJURY REPORTING

All Contractors working within Rouge Steel shall notify the Rouge Steel Engineer or Project Coordinator assigned to the project or work immediately of any incident or injury. The contractor shall also provide the Rouge Steel Engineer or Project Coordinator an incident report and provide the status of any contract employee injured on Rouge Steel Company property within 24 hours of said incident.

Contractor employees requiring only first aid are the sole responsibility of the contracting company. Rouge Steel Company will only provide emergency services to the point of stabilizing a victim and transporting to an outside medical facility.

5.0 WORKPLACE VIOLENCE

RSC Project Coordinator or RSC Security should be contacted any time that an act of workplace violence has occurred. When a continuing threat to other personnel exists, the RSC Security Office should be contacted to arrange for communication and/or partial evacuation of areas exposed to the violence. The decision to cause an evacuation will be made by the Labor Relations Department, in consultation with the Dearborn Police Department. Evacuation commands will be made to supervisors over the radio system and/or telephone system. Contractors will be informed as required.

6.0 BOMB THREATS

Contractor personnel expecting that a threat exists should immediately call the RSC Project Coordinator of RSC Security (on x78888) and report the threat. Company management will be notified.

RSC management will consult with the Dearborn Police Department and a determination will be made if an evacuation should occur and if a search for a suspicious device should take place. Of course, a suspicious device should never be handled in any way; a description of the device and its exact location must be given immediately to RSC Security.

When receiving a bomb threat, it is important to gather as much information as possible from the caller so that the threat can be evaluated. This information should include the following:

- Exact location of the device.
- 2. When will it go off?
- 3. What kind of bomb is it?
- 4. What does it look like?
- 5. Why did the caller place the bomb?
- 6. Where are you calling from?
- 7. Who are you? (sometimes this works)

It is important to keep the caller talking so that as much information as possible can be obtained. Information such as sex, race, age, accent, language used, mannerisms, and background noises that are observed or disclosed during the call can be used to identify the caller. Remember..........don't panic.

7.0 REMOVAL OF WASTES, DEBRIS, AND CONTAINERS

Contractor shall be responsible for proper handling, labeling and disposal of all solvents and hazardous materials brought onto Rouge Steel Company property. It will also be the responsibility of the Contractor to provide their own storage and disposal for any construction debris they generate unless RSC Environmental has approved onsite disposal.

8.0 HOUSEKEEPING

The contractor is responsible to ensure the work area is free of recognized safety hazards. All scrap and waste material shall be removed from the work area in a timely manner. When temporarily storing this material, the means of egress to and from the work area shall not be blocked.

9.0 OFF-LIMIT AREAS OF THE MILL

All areas not involved with contract work are off limits to contractor personnel.

Contractor employees are permitted to travel through other areas to the vending machines, cafeteria and rest rooms; however, there shall be no loitering in areas not involved in contract work. When entering or leaving the facility before or after a work shift or when leaving for any other reason contractor personnel must use normal ingress and egress routes and refrain from entering other mill work areas unless required to because of the location of their assigned job site.

10.0 CONTRACTOR WORK SITE ACCESS PERMITS (WORK PERMITS)

The Contractor Work Site Access Permit (referred to as the Work Permit) must be signed at the beginning of every Contractor work shift scheduled for the Rouge Steel site. It shall not be signed in advance. Both the Rouge Steel Operations and Maintenance Supervisors assigned to the location must sign this form. During turns without production personnel, only the Maintenance Supervisor is required to sign. However, if there is an Operations Supervisor available and assigned to that location, he or she is required to sign the permit as well.

The Work permit system is designed to notify Operations and Maintenance supervision that contractor personnel and supervision are now on-site. A signature(s) on this form does not mean that the specific job sites have been or are safe for work to commence. The contractor along with RSC personnel must review these sites in advance of work commencing or of contractor personnel being directed to those sites to insure that work can safely be initiated or that personnel can be assigned there for set-up or other purposes. The contractor must insure that contractor personnel follow all of the required safety rules and regulations to insure the safety of contractor and Company personnel and others.

11.0 CONTRACTOR'S SAFETY RECORD & TRAINING SUBMISSION

Contractor is required to submit information pertaining to their safety performance and programs for RSC evaluation. These documents should be part of Purchasing's Bidder Qualification records and available for review by the RSC representative and RSC Safety prior to the CSRR meeting.

12.0 HAZARD COMMUNICATION PROGRAM

Rouge Steel requires that Contractors provide us with the following items before their work commences:

- 1. A complete list of all the materials brought on site. Exclude tools and hardware.
- 2. Material Safety Data Sheets (MSDS) for all material brought on site as required by OSHA Hazard Communication Standard 29CFR 1900.1200.
- 3. Information concerning precautionary measures necessary to protect Rouge Steel employees from such materials.

All materials brought on site must also be labeled according to the OSHA Hazard Communication Standard 1910.1200.

The Rouge Steel representative shall advise the contracting company representative of the hazardous materials found in the location where work is commencing and where to find the Material Safety Data Sheets. The Contractor representative shall sign the form provided to confirm that they have been advised of the location of this information.

13.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All Contractor employees working within the RSC Complex shall wear hard hats, safety glasses with side shields, protective footwear, or any other protective clothing and gear as required by applicable safety codes and regulations, or as required by the RSC Project Coordinator.

Fall protection shall be used by contract employees as required by federal, state and local regulations (i.e. greater than 4ft., in man-lifts, etc.).

The contractor is responsible for supplying all relevant Personal Protective Equipment for their employees. The CONTRACTOR SUPERINTENDENT/SUPERVISOR is also responsible for ensuring that contractor employees wear the required Personal Protective Equipment.

14.0 NOTIFICATION TO RSC OF MIOSHA VISIT

The CONTRACTOR SUPERINTENDANT/SUPERVISOR shall notify RSC Safety and the RSC Engineer or Project Coordinator of any MIOSHA visit.

15.0 HAZARD NOTIFICATION

The Contractor shall advise RSC of any unique hazards presented by their employee's work activity or discovered during work.

16.0 CSRR CONTRACTOR EMPLOYEE REVIEW

The CONTRACTOR SUPERINTENDANT/SUPERVISOR or Designated Representative is responsible to provide their own employees/subcontractors a copy of the RSC CSRR, and return the enclosed "CSRR Contractor Employee Review" document (RT-A1-22-07) signed by all on-site employees. This document shall be returned to the RSC Engineer or Project Coordinator at least weekly or until all Contractor employees and Subcontractors have gone through the review.

17.0 RSC CSRR AUDITS

RSC will periodically evaluate the performance of Contractor employees for compliance with items of the RSC CSRR. Contractor operations could be suspended until corrective actions are in place as a response to any observed violations. In addition, a Supplier Corrective Action Request (SCAR) requesting written corrective action could be initiated against a Contractor. (See Procedure PT-G-1-06-09)

JOB SPECIFIC SAFETY REQUIREMENTS

1.0 SAFETY LOCKOUT

Before any work is started, the CONTRACTOR SUPERINTENDENT/SUPERVISOR, after consultation with Rouge Steel Company personnel, will decide if safety lockout is required. If so, the CONTRACTOR SUPERINTENDENT/SUPERVISOR shall coordinate said lockout with Rouge Steel Company personnel to assure that equipment and systems, which could cause injury, are not operated while any employees are working on them.

When safety lockout protection is required, the CONTRACTOR SUPERINTENDENT/SUPERVISOR is responsible to assure that all Contract employees perform safety lockout in accordance with all federal, state and local regulations. The CONTRACTOR SUPERINTENDENT/SUPERVISOR is also responsible to assure that all safety lockout locks used by the contractor are clearly marked with at least the NAME AND PHONE NUMBER of the contracting company.

It is very important that no one begins to work on any equipment or system until it has been properly locked out and everyone has verified that all appropriate locks are in place and all potential energy release has been safeguarded against.

If a safety lockout lock needs to be removed for any reason, the CONTRACTOR SUPERINTENDENT/SUPERVISOR along with Rouge Steel Company personnel shall follow proper lock removal procedures. Safety must come first.

The safety lockout procedure shall be discussed with all employees upon sign-up. Violation of this procedure is cause for immediate dismissal.

2.0 CONFINED SPACE ENTRY PROCEDURES

This section is to notify contractors that Rouge Steel does have confined spaces within this steel mill. Each contractor is responsible for providing their own test equipment and their own written confined space entry program. The Contractor shall utilize their own entry permits when entering a confined space. Please be advised that Rouge Steel will not supply any test equipment nor any entrance permits.

Contractors shall notify Rouge Security Operations prior to entering any confined space by calling (313) 31-78882 or (313) 31-78883. The operator will ask a series of questions including the space location, duration of job, how many in and out, a call back phone number, etc. If an emergency should arise within the confined space the Rouge Security Operations emergency number should be called at (313) 31-78888.

It is also the contractors responsibility to notify Rouge Steel Management any time conditions change in a confined space that could affect others working in that confined space or change the status of a confined space.

3.0 HOT WORK PERMIT PROCEDURE

The Company's insurance company and the Rouge Steel Fire/Rescue Section have approved and implemented an arc welding/metal cutting hot work permit system.

Permits are available from the Rouge Steel Engineer or Project Coordinator overseeing the project or the area Maintenance Supervisor. The permit must be completed in its entirety to be considered valid and shall be posted at the job site. A valid permit will cover the entire job during the course of one contractor shift. A new permit must be completed for each shift.

All combustible material shall be removed from the work area and every precaution shall be taken to protect the surrounding areas. All welding operations shall be shielded to protect employees passing by and overhead crane operators from welding flash.

Work site personnel are required to disconnect all welding leads at the power source when leaving the work area unattended. This is necessary to prevent a fire or possible personal injury due to insulation being cut and shorting out.

Contractors are responsible for providing their own fire-fighting equipment (i.e. fire extinguishers). Rouge Steel Company's fire-fighting equipment is for emergency use only!

The Contractor is also required to provide a fire watch while arc welding/metal cutting is occurring. The fire watch is required to remain in the area during lunches, breaks, shift changes and at least 30 minutes after arc welding/metal cutting has ended.

All hoses, welding leads, extension cords and temporary power leads crossing work areas or employee foot or vehicular traffic aisles shall either be strung overhead (at least 7 feet at the lowest point of sag) or run on the ground. A cover, capable of withstanding the imposed loads without creating a tripping hazard, must protect these hoses, leads and cords. The Company hot work permit has the hot work safety rules printed on the permit.

4.0 COMPRESSED GAS STORAGE

Contractor employees shall ensure that all compressed gas cylinders are stored and used in compliance with all federal, state and local regulations (i.e. properly secured, all safety caps in place, clearly labeled and marked "Full" or "Empty", oxygen and gas stored separately, etc.).

5.0 SAFE RIGGING PRACTICES

Acceptable, safe rigging practices shall be employed by all Contractors when hoisting any materials.

The Contractor assumes full responsibility for the rigging and lifting practices of his employees. Instructions, demonstrations and practice lifts may be necessary to comply with this regulation.

6.0 OVERHEAD CRANES

Overhead cranes are in service throughout the Operations and Shipping areas. When working in crane serviced areas, remain alert to their presence, listen for sirens, and clear workers or impose extreme caution when working in the direct path of a loaded crane.

7.0 HOT SLABS AND COILS

The presence of hot coils and slabs in the Operating areas present the danger of burns, explosions and fire upon contact with personnel or reactive chemicals. Avoid storage near or exposure of chemicals and their vapors to these objects.

8.0 OVERHEAD WORK PROCEDURES

The Contractor Superintendent/Supervisor shall be responsible for notifying RSC and other contractors prior to any overhead work that could result in falling objects. The Contractor who is performing the overhead work is responsible for regulating the area and protecting the area from falling objects. Regulating and protecting includes but is not limited to: safety lockouts.

netting, barrier fencing, etc. Barrier tape is not approved to be used to regulate areas where falling objects could occur.

9.0 LEAD AND ASBESTOS ABATEMENT

The Contractor Superintendent/Supervisor shall provide copies of any lead or asbestos abatement regulatory permits or notifications to the RSC Environmental Department and to the RSC Engineer or Project Coordinator.

10.0 MOTORIZED EQUIPMENT LICENSING

The Contractor is responsible for ensuring that each of the Contractor's employees who operate Powered Mechanical Handling Vehicles is properly licensed as required by federal, state and local regulations.

11.0 TRENCHING/EXCAVATING PROCEDURES

The Contractor is responsible for ensuring that all trenching and excavations are preformed in accordance to federal, state and local regulations. Barrier tape is not approved to be used to regulate areas where a fall hazard exists.

DEPARTMENT SPECIFIC SAFETY REQUIREMENTS

1.0 OPERATIONS HAZARDS

RSC shall inform the Contractor of the known potential; fire, explosion, power system and process release hazards related to the Contractor's work area.

2.0 CHEMICAL HAZARDS

In compliance with item 14.0 of the CSRR, RSC shall inform the Contractor of the hazardous materials used or stored in the Contractor's work area. In addition, access to the Operating area MSDS records and the RSC Hazards Communication Program shall be reviewed.

3.0 CONFINED SPACES

In compliance with item 7.0 of the CSRR, RSC shall provide the Contractor with a list of locations including all confined spaces in the Operating area. The Contractor shall be informed of the specific hazards of any confined spaces they will be exposed to in their work.

4.0 EMERGENCY RESPONSE PLAN (ER)

RSC shall explain the applicable elements of its ER Plan to the Contractor. Topics specific to the subject work area include:

- **4.1 ER Notification Methods** -- Available warning systems and ways to inform Contractor of an incident.
- **4.2 Evacuation Routes and Assembly –** Applicable evacuation route and assembly site plans and locations shall be reviewed with the Contractor.

SEE THE APPENDIX FOR THE DEPARTMENT SPECIFIC CHECKLIST

SAFETY AUDIT OBSERVATION

SUPER'	VISOR:		
DATE:	SHIFT:	TIME:	
1)	WHAT JOB WAS OBSERVED?		
2)	WHAT WRONG ACTION WAS O	BSERVED?	
3)	WHAT COMMENDABLE ACTION	V WAS OBSERVED?	
		The state of the s	
4)	CORRECTIVE ACTION TAKEN:		
5)	PERSONNEL RESPONSIBLE FO	R CORRECTIVE ACTION:	
6)	COMPLETION DATE:	######################################	
DT 14 DD 00			

RT-A1-22-08 SAFETY MARCH 14, 2000

APPENDIX

Department Hazard And Emergency Response Checklist

CONTRACTOR HAZARDS AWARENESS CHECKLIST

OPERATIONS HAZARDS

	Entering and Exiting the Schaefer Road Waste Water Treatment Plant (SRWWTP). Because of limited sightlines for Schaefer Road traffic, contractor drivers must exercise care in entering or exiting the site.
	Open Treatment ponds and lagoons. Contractor is to familiarize himself and his employees with the location of the lagoons and ponds and conduct his operations so as to minimize opportunities for personnel, vehicles and equipment to fall into the lagoons and ponds.
	Remote location. The SRWWTP is a remote location with limited staff availability in the event security or emergency assistance is needed. Accordingly, all contractor personnel must notify their RSC Project Coordinator that they will be at the SRWWTP and notify Rouge Steel personnel at the Operator's office that they have arrived on site. If personnel at the office are not available, a note should be left at the operator's office identifying contractor personnel and where on the site they will be.
	Propane cannons. Propane cannons are fired between dawn and dusk to deter wildlife from using the pond area. Contractor personnel shall wear hearing protection when within 30 feet of the cannons and must avoid standing or moving in front of the cannon muzzle.
<u>HAZA</u>	ARDOUS MATERIALS

 MSDS documents for materials in use or stored on the premises may be accessed by computer
through the RSC Project Coordinator, Operations Supervisor (323-2673), and the Hot Strip Mil
HazCom Coordinator (594-1072).



SCHAEFER ROAD TREATMENT AREA HAZARDS AND EMERGENCY RESPONSE

CONTRACTOR EMERGENCY RESPONSE CHECKLIST

The primary requirements for a Contractor involved in an Emergency Incident are to recognize that an emergency condition exists, understand RSC notification procedures and follow the Evacuation Plan when required.

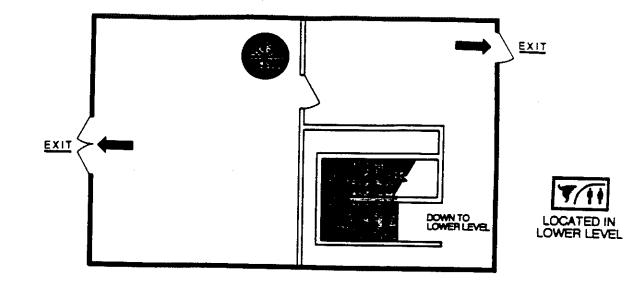
EME	RGENCY INCIDENT RECOGNITION – RSC defines an Emergency as an incident that threatens Life , the Environment , or Property . Review the types of Emergency Incidents and response actions from the RSC Emergency Response Plan applicable to the Contractor's work area.
	FIRE
	CHEMICAL SPILLS AND RELEASES
	TORNADO/SEVERE THUNDERSTORM
	POWER FAILURE
	WINTER STORM
	CONFINED SPACE RESCUE
	STRUCTURAL FAILURE OR ROOF COLLAPSE
<u>EME</u>	RGENCY NOTIFICATION
	Contractors shall carry a remote communication device, either radio or telephone, by which they can be contacted in the event notification is required.
	Emergency contacts shall be the RSC Project Coordinator and RSC SRWWTP operators.
EVAC	CUATION
	Discuss the Evacuation routes for the SRWWTP.
	Identify Storm Shelter Area.
	Identify the Assembly area for the Contractor's work force and their obligation to participate in the RSC head count.

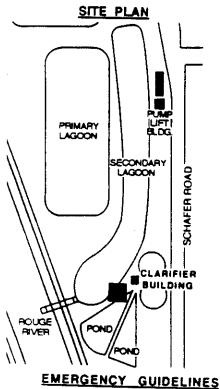


ROUGE STEEL COMPANY SCHAEFER RD. WASTEWATER TREATMENT PLANT

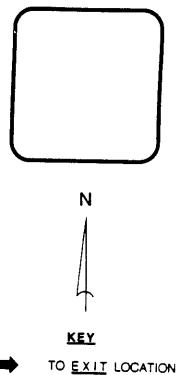
CLARIFIER BUILDING - FIRST FLOOR

EVACUATION PLAN





- A FAMILIARIZE YOURSELF WITH ALL
- B EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT





TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



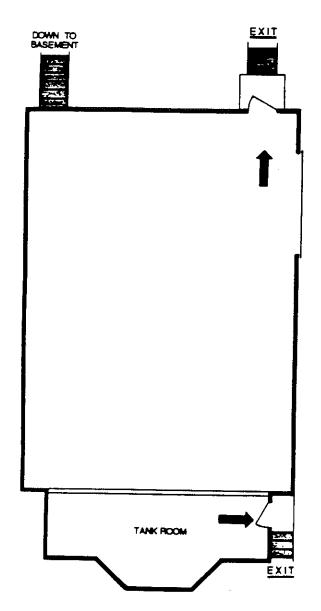
STAIRWAY



ROUGE STEEL COMPANY SCHAEFER RD. WASTEWATER TREATMENT PLANT

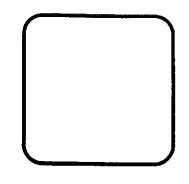
PUMP LIFT BUILDING - FIRST FLOOR

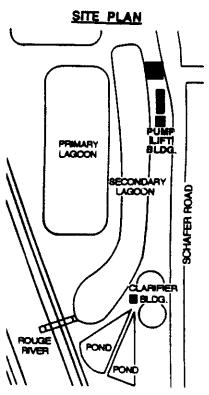
EVACUATION PLAN











EMERGENCY GUIDELINES

- A FAMILIARIZE YOURSELF WITH ALL
- B. EVACUATE THE BUILDING AND PROCEED TO DESIGNATED OUTSIDE ASSEMBLY AREA WHEN INSTRUCTED TO BY MANAGEMENT.
- C. PROCEED TO A DESIGNATED TORNADO SHELTER AREA WHEN INSTRUCTED TO BY MANAGEMENT.

KEY



TO EXIT LOCATION



TORNADO SHELTER AREA



OUTSIDE ASSEMBLY AREA



STAIRWAY

1-800-854-FIRE(3473) COPYRIGHT ©1996 FIRE SAFETY DISPLAYS CO.

ROUGE STEEL COMPANY PRE-JOB CONTRACTOR SAFETY REQUIREMENTS REVIEW (CSRR)

PURPOSE:

The Contractor Safety Requirements Review (CSRR) packet attached to this document defines important Rouge Steel Company (RSC) Safety and Emergency Response policies. Compliance with these CSRR items is mandatory for all contracting companies who will be performing on-site work for RSC.

- 1. The Rouge Steel Company CSRR packet covers the basic safety and emergency response requirements that RSC expects each contractor to follow when performing work within the facility and is in no way intended to address every possible safety issue.
- 2. Rouge Steel Company representatives who administer service contracts are required to review the details of the CSRR packet with each contractor representative before work has begun at Rouge Steel. This can be done individually or in a group meeting setting.

GENERAL GUIDELINES FOR COMPLETING THE CONTRACTOR SAFETY REQUIREMENTS REVIEW (CSRR):

- 1. The RSC Engineer or Project Coordinator shall review the highlights of each section with the Contractor Superintendent/Supervisor, specifically the Contractor's responsibilities as discussed in each section, including the area-specific information.
- 2. The RSC Engineer or Project Coordinator and the Contractor Superintendent/Supervisor shall jointly complete the CSRR compliance page (Form RT-A1-22-03) and check off the items as they are reviewed. The Form will be signed upon completion of the review and the RSC Engineer or Project Coordinator shall retain the original CSRR compliance page with the job file and provide a copy of the Form to the Contractor Superintendent/Supervisor. A copy of the Form shall also be forwarded to RSC Safety.
- The RSC Engineer or Project Coordinator and the Contractor Superintendent/Supervisor shall complete the Emergency Telephone Numbers Page (Form RT-A1-22-04) and the RSC Engineer or Project Coordinator will provide a copy for all appropriate Company and Contractor parties (including RSC Safety and Security).
- 4. The remainder of the CSRR packet shall be retained by the Contractor Superintendent/Supervisor for reference.
- 5. The RSC Engineer or Project Coordinator shall have the Contractor Superintendent/Supervisor complete and return a copy of the CSRR's Contractor Employee Review Signature Sign-off Sheet (Form RT-A1-22-07) to the RSC Engineer or Project Coordinator at least weekly or until all Contractor employees and Subcontractors have gone through the indoctrination. The RSC representative shall forward signed copies to RSC Safety.

NOTE: To facilitate the CSRR the Contractor's Safety Record and Safety Procedures must be presented as part of their Terms and Conditions phase of the RSC Bidder Approval process. A copy of these documents should be reviewed by the RSC representative and RSC Safety sometime before the Form is signed.

Designated members of Operation, Maintenance or the Engineering Department must audit the contractors periodically to verify compliance with the CSRR using the audit system shown in Attachment A to this Policy.

Assuring that contractors abide by the Rouge Steel Company Safety Rules will not only provide for a safer environment for our employees but it will also indicate to them that the Company is committed to safety.

·	
Approved By: Joseph Saugrich	Date:

Supervisor, Industrial Safety & Fire Operations

ROUGE STEEL COMPANY DEARBORN, MICHIGAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)/POLLUTION INCIDENT PREVENTION PLAN (PIPP)

June 16, 1999

Prepared by: Stephanie Albert

Approved by: Gerald Doroshewitz

Project No.: 3246-44



3830 Packard Road, Suite 120 · Ann Arbor, MI 48108 734-973-0700 · Fax 734-973-2904

SPCC CERTIFICATION

I have reviewed the Spill Prevention Control and Countermeasure Plan for Rouge Steel. The facility has been examined and being familiar with the provisions of Title 40 - Protection of the Environment, Chapter I - Environmental Protection Agency, Subchapter D, - Water Programs, Part 112 - Oil Pollution Prevention, as first published in 40 CFR 112; 38 FR 34164, Dec. 11, 1973; Revised through July 1, 1991; amended at 57 FR 52704, Nov. 4, 1992; 58 FR 45035, Aug. 25, 1993; 59 FR 34097, July 1, 1994; corrected at 59 FR 49006, Sept. 26, 1994; amended at 61 FR 9646, March 11, 1996, I certify that to the best of my knowledge that the SPCC portion of this plan has been prepared in accordance with good engineering practices.

woleles P.E.

Name:

Donald S. Windeler

Title:

Manager of Environmental Engineering

Signature:

Date: <u>6/17/99</u>

Registration Number: 22037

State: MI

MANAGEMENT CERTIFICATION

I have reviewed the Spill Prevention Control and Countermeasure Plan for Rouge Steel. The plan is approved and supported by the management team of this facility. The plan will be implemented and followed as herein described. The Environmental Engineering Staff has the authority to commit resources as may be required to protect public health and safety and/or the environment.

Name: Louis D. Camino

Title: President and Chief Operating Officer

Signature: Tows X Camera

Date: 9/19/99

ROUGE STEEL COMPANY SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

AND

POLLUTION INCIDENT PREVENTION PLAN (PIPP) TABLE OF CONTENTS

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ROUGE STEEL COMPANY SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

AND

POLLUTION INCIDENT PREVENTION PLAN (PIPP) TABLE OF CONTENTS (CONT.)

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APPENDIX

Appendix A Certification of Substantial Harm Determination Form



Attachment 1

40 CFR 112.7(b) (precedes the Equipment Failure List)

The review of spill predictions for the oil storage sites (Table 2) at Rouge Steel resulted in the following list (Table 1) of equipment which, because of their location in outdoor sites, would have had potential for direct discharge to the environment. To eliminate this risk, secondary containment has been provided for outdoor tanks, container storage yards, and oil vehicle load/unload areas. The remaining Table 2 oil storage areas are indoor, and typically in facility basements.

If a containment breach occurred no Rouge Steel shorelines would be exposed to oil. In the event that a containment breach or indoor spills reach a plant sewer, oil would generally flow to the Schaefer Road Waste Water Treatment Plant and be collected by oil skimmers, booms and weirs in the clarifiers, pond, and lagoons.

Rouge St. A Company Dearborn, Michigan

Table 1

POTENTIAL EQUIPMENT FAILURE - SPILL PREDICTION

				Oblitio		70× 77 + 1× 15 422 + 17
EQUIPMENT	LOCATION	VOLUME	FAILURE CAN THE TOTAL PROPERTY OF THE PARTY	SPILL RATE (gal/hr)	SPILL	CONTAINMENT VOLUME, gals.
Aller Control of the			Blast Furnace	<u> </u>	hymney to the total of	
DRILL OIL Tank	EE Building East	1,800	discharge pipe rupture	1800	into containment	3000
Air Line Oil Drum Storage	A Furnace	55	drum rupture	55	into containment	. 800
Diesel Fuel Tank	East Boat Dock	400	tank rupture	400	into containment	500
Diesel Fuel Tank	KK Bldg	300	tank rupture	300	into containment	1000
			Basic Oxygen Furnace			
Diesel Fuel Tank	N. Ladle Clean Sta	560	tank rupture	560	into containment	600
Diesel Fuel Tank	South of BOF Recv	200	tank rupture	200	into containment	200 (raincover)
Iubrication Fluid Tank	Outside East	500	tank rupture	500	into containment	300
			Continuous Caster			
Oil Tank	East of Scale Pit	4,000	tank rupture	4,000	into containment	7,600
Oil Tank	West of Scale Pit	4,000	tank rupture	4,000	into containment	7,000
			Hot Strip Mill			•
Lubricating Oil "A" Oil System Tank	Basement	1,500	tank rupture	1,500	into sump and scale pit	1,700,000
Hydraulic Oil Portable Tank	, K47	3,000	truck hose rupture	3,000	into truck containment	3,500
Hydraulic Oil Tank unloading	1110	3,000	truck hose rupture	3,000	into truck containment	3,500
Hydraulic Oil Portable Tank	1176	3,000	truck hose rupture	3,000	into truck containment	3,500
Used Oil Tank	Above Scale Pits	12,000				
Oil Tank	Above Scale Pits	12,000	discharge pipe rupture	12,000	into containment	1.7 million
HSM Oil Storage Area - totes	B68	300	rutured tote	300	into containment	11,000
		<u>.</u>	<u>Cold Mill and Pickling Line</u>	<u>s</u>		
Processing Oil Tank	AA39 (Outside)	20,000	tank rupture	20,000	into containment	21500
Oil Blending Station(Tank)	SO, R.O.W.	10,000	tank rupture	10,000	into containment	30000*
Oil Blending Station(Tank)	SO, R.O.W.	6,000	tank rupture	6,000	into containment	30000*
Oil Blending Station(Totes)	SO. ROW	400	tote rupture	400	into containment	16000
*separate containment built inside station	's dike boundary				1	
			J-9 Shops - HiLo Shop		<u> </u>	
Haz Waste & Waste Oil Drums/Totes	J-9 Southwest	400	tote rupture	400	into containment	20000
Caster Storage- Drums/Fotes	J-9 Southwest		tote rupture	400	into containment	9000
Used Oil Tank	Hilo Shop West	18,000	tank rupture	18,000	into containment	20,000
Hil o Shop Oil Storage-Drums/Fotes	Hilo Shop South	200	tote rupture	200	into containment	1500

.6/15/99

GENERAL SPILL RESPONSE ACTIONS

A. Rouge Steel On-Scene Personnel Responsibilities

Plant personnel are instructed to immediately contact Plant Security in the event of a spill incident. The Plant Security Office is staffed 24 hours per day, 365 days per year, and maintains an up-to-date emergency contact list.

Plant Security - Gate 2 Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121 (313) 317-8888 (Emergencies) (313) 317-8882

Plant security has been instructed to contact Rouge Steel Environmental Engineering [Pager (313) 714-9501] in the event of a chemical or oil spill.

Because the Rouge Complex contains outfalls that are shared by Rouge Steel Company, DESCO, Power and Utilities, and Ford Motor Company components, the responsibility for any spill cleanup effort to prevent or minimize discharges to surface waters might involve personnel of Environmental Services, Transportation and Technical Services, Ford Motor Company. The Rouge Steel Company Environmental Engineering Staff will make this contact if necessary.

Environmental Engineer - Rouge Steel Company

"On Duty" Environmental Engineer
Office: (313) 323-1260
3001 Miller Road
Room 2110, R.O.B.
Dearborn, Michigan 48121
Environmental Pager (313) 714-9501 (24 Hrs)

If the "On Duty" Environmental Engineer cannot be reached, plant security has been instructed to contact an Alternate Environmental Engineer in the order listed below:

2. Don Windeler

Office: (313) 845-3217 Pager: (313) 705-9264 3001 Miller Road Room 2027, R.O.B. Dearborn, Michigan 48121

Home: (313) 479-5227 20630 Maplewood Court Riverview, Michigan 48192



3. Jim Earl

Office: (313) 323-1261 Pager: (313) 714-7268 Home: (734) 522-6019

Lowell T. Potvin

Office: (313) 323-1260 Pager: (313) 705-2648 Home: (734) 386-7451

Charles B. Johnson Office: (313) 594-7375 Pager: (313) 705-2833 Home: (313) 822-9486

Other than the notifications to the local public safety agencies, which is discussed elsewhere in this section, it is the responsibility of the Environmental Engineer to notify the appropriate governmental agencies in the event of an environmental incident. The information to be reported includes, but is not limited to, the following:

- a. Reporting individual's name and telephone number
- b. Time, location and type of spill
- c. Amount and types of material(s) involved
- d. Hazard to environment, including media (land, water, etc.)
- e. Containment and clean-up measures taken

See Attachment 5 for Spill Checklist.

B. Hazard Communication Representatives

The following is a list of Hazard Communication Representatives which are responsible for each of the identified Rouge Steel facilities. Employees are directed to address questions regarding Rouge Steel Company's and the individual facility's Spill Program to these individuals:

Rouge Steel Facility Safety and Protection	Representatives Scott Shepard	<u>Phone</u> (313) 322-4910
Environmental	Charles Johnson	(313) 594-7375
Blast Furnace	Dan Barker Larry Mullins	(313) 322-5080 (313) 845-8034
Basic Oxygen Furnace	Elmer Csizmadia	(313) 322-2998
Continuous Caster	Leo Martinez Thom Henry	(313) 845-0349 (313) 845-8143
Hot Strip Mill	Gil Pendolino	(313) 594-1072



SR WWTP	Tom Barstow	(313) 323-2673
Cold Mills/Pickling Lines	Charles Simpson	(313) 317-1216
Maintenance (J-9)	Hugh Woodrow	(313) 845-1191
Stores	Tom Ruthenberg	(313) 322-4860
Waste Oxide	Lisa Hayes	(313) 317-8890

In addition, Rouge Steel personnel are instructed to report all spill/pollution incidents immediately to Plant Security.

Plant Security	(24-hour)	(313) 317-8888 (Emergencies)
	(24-hour)	(313) 317-8882

The Environmental Engineering Staff have been assigned overall responsibility in coordinating responses to spill/pollution incidents. They are the persons Security has instruction to immediately contact in the event of a spill:

Environmental Engineers

"On Duty" Environmental Engineer

Office: (313) 323-1260

Pager: (313) 714-9501 (24 Hrs)

The "On Duty" Environmental Engineer is responsible for coordinating all emergency responses to spill/pollution incidents, and is familiar with all aspects of the SPCC/PIPP Plan. In addition, the "On Duty" Environmental Engineer has authority to commit the resources necessary to administer the SPCC/PIPP Plan and serve as the principle liaison for the Company to Federal and State regulatory agencies.

In the event of pollution incident or spill which may potentially reach a surface water, the "On Duty" Environmental Engineer will contact Transportation and Technical Services, Ford Motor Company. The following is a list of personnel who may be contacted in such an event:

Contact Person	Office	<u>Home</u>	<u>Pager</u>
D.A. O'Connor Sprv, Env. Services	(313) 594-1014	(734) 513-2178	(313) 796-2801
Kevin Bollen Environmental Engineer	(313) 323-0882	(248) 476-6372	(313) 796-2802
Trinette Moore Environmental Engineer	(313) 248-4581	(248) 368-6089	(313) 796-2803
Heidi Grenkowitz Environmental Engineer	(313) 248-9060	(810) 752-3729	(313) 796-2804
John Miltz Environmental Engineer	(313) 337-3511	(734) 844-0948	(313) 796-2805



Joe Preece (313) 323-0883 (248) 735-3976 (313) 796-2806 Environmental Engineer

C. Outside Agencies

In the event of an incident which presents a serious hazard to property or public health and safety, the plant Security Office and/or spill response coordinator will notify the following municipal agencies:

Dearborn Fire Department

Dearborn Police Department

Telephone: (313) 943-2218 or 911

Telephone: (313) 943-2240 or 911

Minor medical problems would be handled by the on-site facility:

Rouge Medical Facility

Telephone:

(313) 323-0045

In the event of a significant incident involving personal injury, the emergency facilities of Oakwood Hospital would be used:

Oakwood Hospital – Medical Emergency

18101 Oakwood, near Southfield

Dearborn, Michigan 48124

Emergency Department: (313) 593-7440

The various agencies which would be notified, as appropriate, include the following:

Primary Contacts:

U.S. Coast Guard - EPA

National Response Center

Washington, D.C. 1-800-424-8802

State of Michigan

Department of Environmental Quality

Pollution Emergency Alert System (PEAS)

(800) 292-4706

Alternate Contacts: U.S. Coast Guard

Captain of the Port - Detroit

Marine Safety Office

McNamara Office Building Detroit, Michigan 48226

(313) 568-9580

U.S. Environmental Protection Agency, Region V

Michigan-Ohio District Office

9311 Groh Road

Grosse Isle, Michigan 48138

(313) 676-6500



Michigan Department of Environmental Quality S.E. Michigan District Office 38980 Seven Mile Road Livonia, MI 48152 (734) 953-8905

Wayne County Local Emergency Planning Committee 10250 Middlebelt Road Romulus, MI 48174 (734) 942-5289

In the event that undesirable materials have been, or are likely to be discharged to the sanitary sewer system, the following agencies are also to be notified:

Detroit Water and Sewerage Department Industrial Waste Control Section 303 S. Livernois Detroit, MI 48209 Telephone: (313) 224-4775 (24 Hours) (Report spill within 24 hours)

Dearborn Water Department Telephone: (313) 943-2307

D. Outside Contractors

Rouge Steel maintains a yearly purchase agreement with the following outside contractors to aid in spill cleanup operations:

VACALL Services Taylor, Michigan (734) 941-4357 K&D Services Romulus, Michigan (734) 729-3350



E. Spill Response Procedures

Spill cleanup equipment, such as absorbants, booms, shovels, as well as personal protective equipment, are generally available at the individual facilities or can be obtained from RSC Store Rooms. The actual containment and cleanup procedures to be used by the plant and individual facilities are discussed below.

Special precautions during cleanup should be taken to prevent the mixture of acid and alkaline solutions. The appropriate personal protective equipment should be worn during any cleanup procedures.

The following Plan will be initiated upon the release of oil and/or critical materials which cannot be contained by on-scene personnel and that could threaten human health or the environment. It will also be instituted upon recognition of any condition which could result in such a release if not corrected or controlled.

If there is a spill of oil or critical materials which might result, or has resulted in a discharge to surface waters, Environmental Engineering will contact an approved marine pollution prevention contractor to implement any spill cleanup and countermeasure procedures.

In general, Rouge Steel Company will institute the following procedures in the event of a spill:

1. Tank Overflow Procedures

If a tank is to overflow during filling or any other operation, the following procedures should be employed:

- Immediately shut off all pumps or close appropriate valves;
- Stop the leak, if possible;
- Prevent discharge to any sewer or drain, especially storm sewers by diking;
- Remove or recover the spilled material as quickly as possible. For small quantities, utilize absorbent materials; for larger quantities, use portable pumps, vac trucks and waste containers/tanks to collect the spill. The recovered material must be properly stored until utilized in the operation or disposed of by an acceptable method; and
- Remove residual material by the use of absorbent materials. When saturated, the absorbent material must be properly containerized and disposed of by an acceptable method.

2. Procedures for Tank Rupture

- Immediately shut off all valves;
- Stop leak, if possible;



- If leakage cannot be stopped, put the tank contents into suitable containers/portable tanks; and
- Use the recovery and cleanup procedures, as outlined above.
- 3. Procedures for Pipeline Ruptures
 - Immediately shut off all related pumps and/or valves;
 - Follow the recovery and cleanup procedures described above.
- 4. Responsibilities of On-Scene Personnel
 - a. Initiate notification procedure by contact with Rouge Steel Company security, providing the following information:
 - 1) Location of incident
 - 2) Type of incident
 - 3) Extent of emergency response required (e.g., fire apparatus, ambulance), if any
 - 4) Any circumstances known which may affect response.
 - 5) Name of person making report.

See Attachment 5 for On-Scene Personnel Checklist.

- b. Trained Rouge Steel Company Hazwopers will initiate spill response and control measures (defensive actions no contact), such as:
 - 1) Isolate system where possible by closing valves, shutting off pumps, etc.
 - 2) Prevent dispersion of spill to greatest extent possible (e.g., by use of earthen dams, adsorbent materials, absorbent booms).
 - 3) Provide barriers to prevent unauthorized access to spill sites.
- c. Remain on-site until arrival of contracted emergency response personnel
- 5. Responsibility of The Incident Commander, Senior Official or Area Coordinator
 - a. Evaluate situation based on initial information and give instructions as required;
 - b. Proceed immediately to location of incident to direct response efforts;
 - c. If a release of oil or critical material has occurred which could threaten human health or the environment, The Rouge Steel Company "On Duty" Environmental Engineer will give immediate notification to the National Response Center (refer to General Spill Response Actions), including [40 CFR 112.4 (a)]:
 - 1) Reporting individual's name and telephone number



- 2) Rouge Steel Company and location of spill (e.g., Hot Strip Mill)
- 3) Time and type of incident
- 4) Amount and name of materials involved
- 5) Any injuries
- 6) Hazards to public health and environment
- 7) Actions taken for containment and cleanup
- d. Notify Schaefer Road Treatment Plant personnel if there is a likelihood of spilled material (pickling acid or oil) reaching that point.
- e. If a threat to public waters exists, approved marine pollution prevention contractor will be contacted immediately upon knowledge of such a threat.
- f. Immediately make a complete record of the incident.
- g. In the event of a discharge of materials to a watercourse, submit a written report to the Michigan Department of Environmental Quality within ten (10) days.

F. Spill Response During Off-Shifts, Weekends or Holidays

For spills occurring during the off-shifts, weekends and holidays, notify the Environmental Engineer on duty by using the Environmental Pager. If unable to make the contact, Security should be contacted immediately. In addition, one of the alternate personnel previously listed should be contacted.



G. Containment Equipment

The following containment equipment is maintained on the Rouge Steel site and is available in the event of a spill of a regulated material.

Rouge Steel Operations Warehouse

(1) Pallet of Speedy Dry Absorbant

Operated & Stored by Ford T & TS

- Sections of absorbant boom
- Warne Boom
- 22' Catamaran work boat with outboard motor.

The Warne boom is in the boat slip water and is pulled across the boat slip in the event that oil passes over primary and secondary booms, or for other reason.

Any unlikely losses of oil which might drain into the Roulo Creek enclosure, or to other tributary storm sewers, or occur coincidentally with storm runoff, can be controlled by three containment devices in the Boat Slip. One of these systems is a series of four, belt-type oil separator units. The second device is a double boom arrangement in the northwest corner of the Boat Slip. The third device is a boom capable of being placed across the boat slip. The fourth containment device is a pneumatic barrier which exists across the south end of the Boat Slip and creates a ridge of high water. This pneumatic air curtain retains any surface oil which might escape the previous containment devices.



ROUGE STEEL COMPANY SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) AND

POLLUTION INCIDENT PREVENTION PLAN (PIPP)

I. INTRODUCTION

Rouge Steel Company produces hot rolled and cold rolled carbon steel strip. Such an operation requires the use of various types of oils, emulsions and chemicals. By-products are also generated from the production of steel. This PIPP/SPCC Plan outlines the measures undertaken by Rouge Steel Company personnel to prevent, or at least minimize, the pollution resulting from the uncontrolled release of these materials. This Spill Prevention and Control Program has been designed to provide procedures for preventing the discharge or release of oil and other regulated materials from entering nearby surface waters and to mitigate the results of any discharge that may occur before it enters surface waters.

The Spill Plan discusses plant-wide policies relating to notification requirements; personnel; government agencies; security; personnel training; material inventory and storage; Rouge Steel Company's sewer system; PCB components throughout the plant; topographic map; and site plan.

The Rouge Steel Plant is comprised of several facilities, each contributing a unique function in the overall steel making process:

- Blast Furnace;
- Basic Oxygen Furnace;
- Continuous Caster;
- Hot Strip Mill; and
- Cold Mill and Pickling Line.

At the blast furnace, iron ore, limestone, and coke are placed into the top of the furnace and heated air is blown into the bottom. Combustion of the coke provides heat and a reducing atmosphere which produce metallurgical reactions in the furnace. The limestone forms a fluid slag. Molten iron and the molten slag, which floats on top of the iron, are periodically withdrawn from the bottom of the furnace. The blast furnace flue gas, which has heating value, is cleaned and burned in stoves to preheat the incoming air to the furnace or sent to the Powerhouse for boiler fuel.



Scrap and molten iron are placed in the vessel and oxygen is then blown. High-purity oxygen is supplied at high pressure through a water-cooled lance mounted above the center of the vessel. A reaction occurs immediately, bringing the molten metal and hot gases into intimate contact causing impurities to burn off quickly. Alloys are added and the steel is tapped.

In the Continuous Caster Process, hot molten steel is poured from the ladle into a refractory lined tundish. The tundish serves to maintain a constant head of molten metal. This provides for a controlled casting rate. Lubricants are sprayed into the molds to facilitate steel movement through the mold. As the metal solidifies in the mold, the cast product is withdrawn continuously. After passing through water cooled molds, the partially solidified product passes into a secondary cooling zone, where sprays of water remove sufficient heat to complete solidification of the semi-finished product. The product then passes into the cut-off zone, where it is cut to the desired length.

Slabs from the Continuous Caster are transferred by mobile carrier to the piler at the entry end of the reheat furnaces. The slabs are placed in three walking beam reheat furnaces where they are heated to desired rolling temperature. The heated slab is then passed through four roughing mill stands where the scale is removed by high pressure sprays and the slab thickness is reduced. The strip continues on through seven finishing stand rollers where the strip is further reduces to the desired thickness. The coil continues across the run-out table where it is sprayed with water to cool the strip to the desired finishing temperature for physical properties. The strip is then wrapped into a coil of steel called a "black band".

Unheated steel products are reduced in thickness by cold rolling operations. The cold rolling operation compresses the steel between rolls to reduce the thickness of the product while imparting desired physical, mechanical, and surface properties. Oil solutions are applied directly to the rolls or product to dissipate the heat produced during rolling and to provide lubrication. Various oils are used depending on the product being rolled and the properties desired in the steel.

This Plan has been prepared in accordance with Section 31 Of Michigan Act 45 Part 5 Rule 323.1162, and 40 CFR 112, EPA SPCC regulations. Each Rouge Steel facility has been given a copy of this Plan to aid in the implementation of the policy at the Rouge Steel plant.



II. GENERAL INFORMATION/CONTACTS

- A. Facility
 Rouge Steel Company
 3001 Miller Road
 Dearborn, Michigan 48121
- B. Person in Charge of Facility
 Louis D. Camino
 President and Chief Operating Officer
 3001 Miller Road
 Dearborn, Michigan 48121
- C. Persons Responsible for Spill Control Planning "On Duty" Environmental Engineer (313) 323-1260



III. RACILUIYAGUIDELINE CONFORMANCE

A. Past Spill Experience [40 CFR 112.7(a)]

In the past three years, no oil spills have occurred at Rouge Steel.

B. Potential Equipment Failures [40 CFR 112.7(b)]

The potential for equipment failures have been examined. Refer to Table 1 (in Attachment 1) for the findings.

C. Storage Facility Containment [40 CFR 112.7(c)(1)]

There are two types of oily material storage applications at Rouge Steel; virgin oil for process applications, and waste oil derived from the processes. Where required to protect waters of the state, storage tanks are enclosed with containment dikes.

The loading and unloading area for tank trucks is curbed to provide secondary containment.

Weirs, booms or other barriers are available from the local clean-up contractor.

The wastewater facility has the capacity of handling a 2,000 gallon oil spill event in a 24-hour period.

D. Containment Drainage [40 CFR 112.7(e)(1)]

Rouge has no dikes fitted with drainage valves. However, the remedy for an oil spill would be pump evacuation and container transfer to a waste oil tank. Dike water is handled by evacuation of the storm water to our wastewater treatment facility which is designed to remove residual oil prior to discharge to the Rouge River.

E. General Bulk Storage System [40 CFR 112.7(e)(2)]

All oil bulk storage tanks are constructed of steel and are compatible with the oils stored in them.

All secondary containment for oil tanks are either concrete, asphalt or steel; sized for the largest single tank plus an allowance for precipitation and are impervious to the oils stored in their tanks.

All containment areas are constructed without drains. Therefore, there are no by-pass valves. When rainwater accumulates the material in the containment area it is removed. The material is to be removed using a pump and or vac truck, and disposed of by recycling and or treatment at an approved facility.

All tanks are visually observed during loading and unloading to prevent any overfilling of the tank or the receiving vehicle. In some cases, visual gauges are used for fast response. Visual gauges include site glasses, indicator dials, and etc.

Any oil leaks from tanks or equipment are to be repaired immediately. Any spilled material is to be cleaned up and properly disposed.



There are no underground or partially buried storage tanks at this facility.

Aboveground tanks are not tested every five years. However, visual inspections are performed. Refer to Attachment 2 for a blank copy of the inspection forms. The completed inspection forms are stored in the Environmental Engineering Office.

There are no internal heating coils.

Plant effluent discharged into the Rouge River is observed as required by the NPDES permit MI0043524.

Portable tanks and other mobile oil storage are provided with secondary containment, and located where they will not be subject to periodic flooding.

F. Facility Oil Transfer Operations [40 CFR 112.7(e)(3)]

Buried oil pipelines are wrapped/coated to reduce corrosion or will be inspected for deterioration or leaks and be repaired as required. Pressure testing for piping is not conducted every five years.

All terminal connections on oil gravity discharge lines are capped or blanked flanged when not in use.

All pipe supports are designed to minimize corrosion and allow for expansion.

All aboveground oil piping is marked by signs warning large vehicles to be cautious of above ground piping, where impact is possible.

G. Facility Tank Trunk Loading/Unloading Practice [40 CFR 112.7(e)(4)]

Loading procedures meet the minimum requirements and regulations established by the Department of Transportation.

A truck loading/unloading procedure is contained in the addendum to Table 2 (in Attachment 1). It is provided to each vehicle driver prior to his unloading/loading.

All vehicles loading or unloading are to be positioned in such a manner that any spill from their tanks will be contained either; on concrete truck containment pads (dwgs. 97-GF1, Sheets 1-3 in Attachment 3) that have a volume equal to the largest compartment of the vehicle, or directed by sewer drainage to Rouge Steel Company's oil recovery lagoon.

The loading/unloading procedure which is provided to each vehicle driver, contains a warning for drivers to inspect vehicles for connected hoses and to disconnect them prior to departure. Warning signs are also posted at most truck loading /unloading sites.

All drains and outlets on tank cars and tank trucks are inspected for leakage prior to filling and departure. See the tank truck loading/unloading Procedure following Table 2.

Table 2 shows the material storage inventory for the entire Rouge Steel Plant. The Table also indicates the spill potential and loading and unloading methods employed for each



tank. An addendum to Table 2 includes loading/unloading procedures for the entire plant.

H. Facility Inspections and Records [40 CFR 112.7(e)(8)]

Monthly routine inspections are made of areas of the individual plant facilities which could conceivably contribute to a pollution incident. Rouge Steel personnel who are familiar with the facility operations and the Rouge Steel SPCC/PIPP Plan and its related policies perform the inspections. The designated employee(s) inspects the regulated tanks and general conditions of the surrounding area. The facility's environmental representative is responsible for such inspections, which he coordinates with other plant engineers, safety representatives, and the Rouge Steel Company Environmental Engineering Department. He particularly seeks out potential weaknesses before an incident or failure can occur. Monthly inspection checklists are provided in the Attachment 2. Copies of the completed checklists are retained on file at the Environmental Engineering Office and available for review Monday - Friday, 8:00 A.M. - 4:30 P.M. Inspection records are retained for a minimum of three years.

I. Oil Production Facilities [40 CFR 112.7(e)(5)]

This is not an oil producing facility.

J. Security Measures for Spill Prevention [40 CFR 112.7(e)(9)]

The Ford and Rouge Steel Complex is fully fenced. Guards are posted at entrances.

A vehicle pass and I.D. are required to gain entrance to the complex.

All valves which permit gravity discharge of oil from a tank to surface are to be locked elosed when not operating or on extended standby.

Any starter controls for oil pumps not operating or on non standby status are to be locked out and the key is to be kept in the department office.

Facility security is further enhanced by an extensive network of Night Lights in and around the oily material service centers. Consideration in the location of the lights was given to discover spills at night and prevent vandalism.

K. Personnel Training

The personnel involved with materials handling can be considered in three echelons:

- A. Environmental Staff
- B. Production Supervisors
- C. Hourly Production Staff

Rouge Steel's Environmental Engineering Staff is given the responsibility for keeping current with the various regulations and with insuring that all other appropriate personnel are properly trained to comply with existing regulations.



The second echelon includes the general supervisor and supervisors of the various operational departments within the company. These individuals will receive directions and/or instructions from the Environmental Engineering Staff. This instruction will be presented individually for each department, and will deal specifically with the requirements of that department. This training will be conducted at intervals frequent enough to assure adequate understanding of the Plan for the facility; annually at a minimum. The items to be covered in these training sessions will include, but not necessarily be limited to, the following:

- A. Notification requirements (internal and external)
- B. Communications and alarm systems
- C. Response procedures to various types of spills
- D. Location and use of spill response equipment
- E. Training requirements for hourly personnel
- F. Highlights and descriptions of known spill events or failures, malfunctioning components, and recently developed precautionary measures
- G. Reporting requirements to regulatory authorities

The supervisory personnel will in turn be responsible for training designated hourly personnel in proper spill response procedures. This training will be in the form of on-the-job training, which must be completed by each employee before being assigned to work in an unsupervised position. The minimum training elements include the following:

- A. Internal notification procedures
- B. Areas exhibiting spill potential
- C. Response procedures and equipment
- D. Location of communication and alarm systems
- E. Review potential or past spill problems

The Environmental Engineering Staff shall maintain a record of all training for a period of three years.

IV. GOVERNMENT AGENCIES

A copy of the Plan is maintained by plant management and is available for on-site review by representatives of the U.S. Environmental Protection Agency, the Michigan Department of Environmental Quality, and/or the U.S. Coast Guard, by official request during normal working hours.



V. ROUGE SEWER SYSTEM

The Rouge Steel property (within the Rouge complex) is drained by four major sewer systems into the Rouge River. Each system is briefly described below and referenced in Figures 1 and 2. Details of each facilities' process and storm water systems are shown in Figures 3 through 7. Figures are included in Attachment 4.

Outfall 001 (Schaefer Road)

Most of the southwesterly portions of the Rouge Complex drain to the Schaefer Road wastewater treatment facility. Normal process wastewater is pumped through two, 110'-diameter clarifiers and two oil-polishing lagoons for treatment of oil and suspended solids. Storm drainage flows which exceed the capacity of the pump station, overflow directly into the secondary oil-polishing lagoon.

Outfall 002 (12A Lagoon)

The south portion of the Rouge Steel property west of the Boat Slip drains to the Gate 12A sewer system. This system is protected with an oil containment lagoon.

Outfall 004 (Boat Slip)

The northeast portion of the Rouge Steel property and areas adjacent to the Boat Slip drain to the Boat Slip. The northerly portion of the Boat Slip is protected with two sets of oil booms and continuous oil skimming equipment. An underwater air bubbler (pneumatic barrier) is situated at the south end of the Boat Slip, which serves as a vertical curtain to retain any incidental oil losses.

Outfall 006 (Tailrace)

The southeastern portion of the Rouge Complex, including the Power and Utility Operations drains to the Tailrace enclosure. This outfall is the responsibility of Power and Utility operations.

VI. PCB MANAGEMENT (TSCA REGULATION 40 CFR 761)

A. PCB Inventory

Polychlorinated biphenyls (PCBs) are contained in numerous electrical transformers located throughout the Rouge Steel Plant. There are about 80 electrical transformers in the Rouge Steel Plant which contain PCB fluids. All of the identified units have been appropriately labeled to indicate the presence of PCB fluids within the unit (40 CFR 761). All units containing PCB fluid have been diked to provide capacity for 150% of the unit's capacity. The location and listing of PCB capacities within the various units are presented in Table 3 in Attachment 1.



B. PCB Control

PCB equipment and storage areas are inspected quarterly, as required by federal regulations. Individual inspection sheets for these items are completed by the RSC maintenance personnel, and kept on file with the Environmental Engineering office.

Maintenance of the electrical equipment is performed by the RSC Electrical Maintenance Department. Sample analysis of the dielectric fluids is performed by various contractors – at the request of RSC.

C. Emergency Response and Disposal

Both emergency response to the release of PCB fluids and disposal of defective or obsolete PCB-contaminated oils and equipment will be handled under contract by an appropriately licensed service contractor. The service contractor will be requested by the "On Duty" Environmental Engineer or his alternate immediately upon notification by plant personnel of a leaking or defective PCB-containing unit. Any contaminated area will be isolated until cleanup occurs and the area has been certified as being adequately decontaminated by appropriate analytical procedure (bulk soil analysis, wipe test analysis, etc.). All PCB cleanup, handling, and disposal will be performed by outside contractors under direction of "On Duty" Environmental Engineer, in compliance with applicable DEQ (PCB Rules 13-17) and U.S. EPA (40 CFR 761) regulations.

Summarizing these requirements, TSCA requires different response and cleanup procedures for low concentration PCB spills (<500 ppm) and high concentration PCB spills (>500 ppm).

For low concentration spills, the contractors will perform the following activities within 48 hours.

- Double wash/rinse potentially contaminated structural surfaces;
- Excavate potentially contaminated soil in the spill area; and
- Backfill with clean soil.

In addition, Rouge Steel Company personnel are required to document all cleanup efforts by completing a PCB Spill Form. Such spill reports must be retained on-site for five years.

For high concentration spills, contractors will complete the following within 48 hours:

- Estimate spill area;
- Cordon off spill area plus 3-foot buffer;
- Erect visible Signs around the area;
- Record and document the exact location of the spill and contaminated area;
- Clean high contact surfaces to 10 ugs/100 cm²;



United States Environmental Protection Agency



Region V 77 West Jackson Blvd. Chicago, Illinois 60604

Office of Superfund Emergency Response Branch Oil Planning and Response Section

Facsimile Cover Shear

Telephone Number FTS: 312-353-9176

Office phone:

Machine No:

Office code: SE-5J Number of pages,

including cover:

Signature:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

20 ISS

REPLY TO THE ATTENTION OF:

SE-5J/OPRS-SPCC W37801

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald S. Windeler Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Dear Windeler:

An inspection of your facility on September 24, 1998, indicated that your Spill Prevention, Control and Countermeasures ("SPCC") Plan does not address the requirements of Part 112 of Title 40 of the Code of Federal Regulations ("40 C.F.R. Part 112"). The deficiencies of your facility's Plan are listed in Attachment A to this letter.

Also, under 40 C.F.R. Section 112.20(e), 59 Federal Register 34070, 34098-34101 (July 1, 1994), the owner/operator of a facility must determine pursuant to 112.20(a) (2) whether the facility could, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines of the United States. Those facilities which could not reasonably be expected to cause substantial harm shall complete and maintain at the facility the certification form contained in Part 112 Attachment C-II-Certification of the Applicability of the Substantial Harm Criteria. Attachment C-II has been enclosed with this letter to assist you in this self-determination process.

Pursuant to Section 311(b) of the Clean Water Act, as amended by the Oil Pollution Act of 1990, 33 U.S.C. § 1321(b), violations of the SPCC regulations, contained at 40 C.F.R. Part 112, subject owners and operators of a facility to administrative civil penalties of up to \$11,000 per day (up to a maximum of \$127,500) or judicial civil penalties of up to \$27,500 per day.

Rouge Steel Company should promptly take action to correct the violations and come into compliance with the SPCC regulations, if it has not already done so. To determine your present status of compliance with the SPCC regulations, U.S. EPA requests, pursuant to Sections 311(m) and 308(a) of the Clean Water Act, 33 U.S.C. §§ 1321(m) and 1318(a), that you provide the documents which can be found in Attachment A (which specifies information which the facility must submit for each violation) and a completed copy of Attachment C-II within thirty (30) calendar days from the date of receipt of this letter.

Jellian

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These materials should be sent to:

U.S. Environmental Protection Agency Superfund Division - Region V Emergency and Enforcement Response Branch Emergency Response Section 1 9311 Groh Road Grosse Ile, Michigan 48138 Attn: Ross E. Powers, On-Scene Coordinator

All materials submitted must be accompanied by a certification that all materials and all statements submitted by your facility are true and accurate to the best of the signatory's knowledge and belief. This certification must be notarized and signed by an authorized official of your facility. The SPCC plan and all subsequent amendments must be reviewed and certified by a registered Professional Engineer who is familiar with the facility and with 40 C.F.R. Part 112. The engineer's name, registration number, State of registration, date of certification and seal must be included as part of the Plan.

This Request for Information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Part 35. The U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

In addition, enclosed for your information is a sample form which can be attached to your SPCC Plan to document that the required three year review has been completed. Finally, we have also enclosed a poster which identifies the State, regional and national emergency phone numbers which may be used on a 24-hour 7-day/week basis to report spills. Feel free to reproduce this poster.

If U.S. EPA does not receive an adequate response from your facility, it will be required to review its enforcement options. If you have any questions, please feel free to contact Ross Powers at (734) 692-7681.

Sincerely,

Beverly J. Kush, Chief

Oil Planning & Response Section

Attachments : Violations - Attachment A

Inspectors Comments - Attachment B

Three-year annual review form

C-II form Poster

cc: Michigan Department of Environmental Quality Mark Moloney, U.S. EPA - Westlake, CH ME-W hcc: yellow (official case file) blue (SPCC read)

SPCC1 - Noncompliance/mdadamo/6-5905/rouge/disk #7/12-14-98

ATTACHMENT A

VIOLATIONS OF THE SPCC REGULATION FOUND DURING INSPECTION

- 1. For Failure to Implement the Facility's SPCC Plan: A statement certifying that the provisions listed below have been implemented, provided that your facility has implemented these provisions. If your facility has not implemented these provisions, submit a schedule, signed by an authorized official from your facility, which indicates when the provisions will be implemented and when a certification will be submitted to U.S. EPA.
- 2. For Failure to Amend SPCC Plan: An amended SPCC Plan, certified by a Registered Professional Engineer, approved by management at a level with authority to commit the necessary resources, and photographic evidence that your SPCC Plan has been fully implemented along with a statement from an authorized representative of your facility identifying and authenticating the photographs and certifying the date on which the facility amended and fully implemented its SPCC Plan. If your facility is unable to provide an adequate SPCC Plan within the required time period, then your facility should submit, within thirty days of receipt of this letter, a detailed schedule which indicates when the facility's SPCC Plan will be complete and when implementation will occur. Within the time frame set forth in that schedule, your facility will then submit the above-requested information.
- Professional Engineer, approved by management at a level with authority to commit the necessary resources, and photographic evidence that your SPCC Plan has been fully implemented along with a statement from an authorized representative of your facility identifying and authenticating the photographs and certifying the date on which the facility fully implemented its SPCC Plan. If your facility is unable to provide an adequate SPCC Plan within the required time period, then your facility should submit, within thirty days of receipt of this letter, a detailed schedule which indicates when the facility's SPCC Plan will be complete and when implementation will occur. Within the time frame set forth in that schedule, your facility will then submit the above-requested information. Please respond to/address the specific deficiencies listed below:
 - 40 CFR 112.7 Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasure Plan
 - (b) Failure to predict the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each major type of equipment failure. The company does not address the rate of flow or quantity of spill to containment area or treatment systems, the Plan does not discuss predictions if the oil were to breach containment. Several tanks were found that were not included on the SPCC inventory, and the contents were unmarked and unknown (Photo 14,14a,15,16,21,23,26,28,29,31).
 - (c) Failure to provide adequate secondary containment and/or diversionary structures or equipment if practicable; including sorbent materials. The location of sorbent material said to be

stockpiled was unknown to environmental staff and several other supervisors that were asked on September 24, 1998. On September 30, 1998, we finally found a maintenance foreman that could show me a pallet of sorbents inside the mechanical maintenance building. Apparently very few workers knew where sorbent, broom and shovels could be found. Secondary containment, or contingencies for portable tanks located throughout the facility were not addressed. Dikes around Coal Tar Tanks, "Smiley" waste oil tank, and the 20,000 gal processing oil "Pickle oil" tank, all contained foreign materials, taking up considerable space inside the diked areas. The Oil Blending Station only had a 3 inch berm with about 2,140 gallons capacity that was sloped toward the boat slip. Several miscellaneous tote tanks and barrels of oil were stored throughout the plant without secondary containment or acknowledgment in the SPCC Plan. The "Smiley Tank cement block dike wall had been broken through in two spots and had cracked mortar joints. The inside soils were heavily saturated with spilled oil. About a foot of soil had accumulated inside the diked area. On 9/30/98, workers were observed removing the oily soils. Likewise, on 9/30/98, workers were removing soils from inside the Pickle oil dikes.

(e) (2) Failure to provide complete discussions and/or implement requirements pertaining to Bulk Storage Tanks Large storage tanks marked Lab...Hazardous Waste...XIX in the XX By-Products Building area, a companion tank in the Smiley tank diked area, Tote tanks in the Grease House area, Hot Strip Mill Waste Oil area, outside of the Tandem Mill, barrels near the Hot Strip Mill Waste Oil area, Blast Furnace "A" area and in the XX building shed and fuel tanks in the Coal Tar dikes, were not mentioned in the SPCC Plan. Coke plant tanks no longer in use need to have piping disconnected, and certified by Professional Engineer as no longer capable of oil storage, eliminating need to develope a Facvility Response Plan for the facility.

Underground storage tanks are not discussed in the Plan although two 15,000 gallon waste oil tanks do exist at the Schaefer Treatment Plant, near the Rouge River.

- (vi) Failure to test aboveground tanks by hydrostatic testing, or visual inspection or shell thickness testing (with comparison records maintained); Monthly Inspection reports only report visual observations of satisfactory or unsatisfactory, without definition. Notations of dike condition: "12" of water in wall", "6" of water in retaining wall, "bad", "deteriorating", "rusting ", "fair" were all marked satisfactory. Testing is not done. Records are kept on file in Environmental Engineering (See example Monthly inspection reports).
- (x) Failure to promptly correct visual oil leaks from tanks and related equipment. Oil leaks and evidence of recently cleaned soils from oil leaks was noted in numerous areas throughout the facility. Inside buildings, in basements, and in outside areas. To list a few: Fuel spills at Coal Tar area (Photo 29), XX Building shed (Photo 26,27), Hazardous Waste and Waste Oil Drum Storage Pad. tank spill (Photo 10,11,24) inside Waste oil dike, (Photo 14, 14a) inside Oil Blending Station berned area Photo, 3,4,5,6,6a), Grease House (Photo 19,20), basement of Slab Mill and inside Hydraulic Pump Room 115. Oil dumping from hydraulic tank near Waste barrel area on 9/30/98, was

promptly addressed, after Environmental Engineering sought out plant workers and a clean up contractor at the facility and directed them to abate the leak and clean up the spill (Photo 10,11,24).

- (e) (9) Security (excluding oil production facilities)
- (ii) Failure to securely lock master flow and drain valves in the closed position or any other valves that will permit direct outward flow of the tanks contents to the surface when in non-operating or non-standby status. Scale Pit and Grease House areas had unlocked valves, and doors leading to pump switches (Photo 17,18,19,22).
- (iii) Failure to lock in the off position or make accessible only to authorized personnel starter controls on all oil pumps in a non-operating or non-standby status. Scale Pit and Grease House areas had unlocked valves and doors leading to pump switches (Photo 17,18,19,22).
- (iv) Failure to securely cap or blank-flange loading/unloading connections of oil pipelines when not in service or on standby status for an extended time period. Unmarked tank in Scale Pit area had pipeline that was not blank-flanged (Photo 18).
- (e) (10) Personnel, training and spill prevention procedures.
 (i) Failure to properly instruct personnel in the operation and maintenance of equipment used to prevent oil discharges and in the pollution control laws, rules and regulations. Employees were unable to find 10'booms, a pallet of Speedy Dry absorbent, brooms or shovels, as called for in the SPCC Plan.
 In addition, the dumping of oil on the ground discovered on 9/30/98, outside

In addition, the dumping of oil on the ground discovered on 9/30/98, outside the Hazardous Waste and Waste Oil Drum Storage area, illustrates the lack of environmental awareness on the part of the workers and their supervisors. Oil leaks on the floors, walls, basements, drains and grounds of the plant are common place and tolerated by management. Besides the obvious fire and slip dangers to plant personnel, unattended in-plant petroleum spills run contrary to environmental disposal rules, conservation and spill prevention principles.

Attachment B.

Inspectors Comments:

Also listed below for your use are some comments, suggested corrective actions, typographical problems, and hopefully helpful suggestions from Mr. Powers. He is willing assist you if you have any questions about these comments. You can call him at 734-692-7681 or fax 734-692-7677.

General Comments on the June 1997, SPCC Plan for Rouge Sted:

It is apparent that Rouge Steel Company (RSC) has put considerable thought and efforts into spill prevention at this facility. These efforts have paid off, in that they have not had any reportable oil spills to the Rouge River in at least three years. Despite this fact, RSC needs to amend their plan.

As part of a multi-company inclustrial complex designed to be under the control of one company, they have a unique coordination challenge. RSC is but one part of the spill prevention efforts at the old Ford Rouge Complex. If any part fails, the plans of others fail, therefore it is important to cultivate cooperation and coordination at this industrial complex. How well they work together with the other companies will decide how well their plan works in an emergency. They have a unique situation, where they depend on others to save the oil spill from reaching the downriver areas. They also have a unique situation, in that they depend on permanent oil booms and bubblers in the Ford boat slip, operated by Ford, to stop and recover any spill.

They do not fuel over water or have a USCG Facility Response Plan (FRP), however they are on waters navigable by large ore boats, and in the USCG area of response under the National Contingency Plan. RSC has not planned countermeasures to protect downstream areas, nor practice drilled with the USCG for this event. They have over 1,000,000 gallons above ground storage, and technically need a FRP.

Upon close examination of the SPCC plan and the plant, we found some items that need to be corrected, as added insurance and to comply with the intent of the SPCC regulations. I have listed them and offer some suggested changes below.

A. Potential SPCC Violations / and suggested corrections:

1. Failure to develop an Facility Response Plan (FRP). Coke plant and Slab Mill areas were shut down, but oil storage tanks were not emptied and in many cases and were not cleaned and taken out of service. The total oil storage capacity of RSC is about 2,865,000 gallons. If the Coke Plant tanks are taken out of service, the plant only has about 145,000 gallons of storage, 200,000 gallons at most, if you count some miscellaneous areas not presently listed.

Corrective Actions: Empty unused tanks, disconnect piping or otherwise render unusable for storage, reducing oil storage capacity to under 1,000,000 gallons. Provide agency with letter certifying that these tanks are now out of service, OR develop FRP.

2. Failure to implement SPCC plan. Several oil storage areas were not included in the SPCC plan, or were no longer in use. The total quantity of oil that could be discharged, the rate and direction of the spill was therefore not addressed. Adsorbents, brooms and shovels were not stockpiled, or if they were, Environmental Engineering, did not know where to find them (p.11). A valve on one tank was found unlocked on September 24, 1998, another did not have a lock, and one pipe was not blank flanged (p.4a), one pipe was not capped (p.5h). 10' Sections of absorbent boom, were not found (p.14). Coke plant XX building Area Lubricating Oil Drum Storage Area leaks not being reported on Monthly Inspection Report (p.A-12). Oil leaks from uncapped pipes, shut-down machinery, and barrels were common throughout the plant. Several ongoing leaks and past spillages outside of diked areas to soils and basements and sewers were not being cleaned up as require by the plan to "stop the leak"

and "clean it up". Did not see "visual gauges" on all tanks...or "double containment dikes", as per p. 3. Oil spill to ground by Haz. Waste storage area found during field inspection, illustrates casual treatment of oil by employees, and failure of notification system.

Corrective Actions:

- a. Provide a central spill supply area, stocked with pallet of absorbent, several sections of 10 ft. absorbent booms, shovels and brooms. Let it be known to all divisions how they can access these emergency supplies.
- b. Immediately clean up the oil spillages inside the plant and investigate the cause and train monthly inspection reporters, what is meant by satisfactory and unsatisfactory. (Noted clean ups underway, September 30, 1998.) Oil suspected of containing PCBs or hazardous wastes, should be tested and disposed of as toxic or hazardous materials.
- c. Leaks from closed facilities, such as the Slab Mill area should be stopped and cleaned up.
- d. Clean up oil spillages at the By Products Bld. XX, where 26 hibe oil barrels in shed (not listed in SPCC plan) are leaking on floor and of building on the ground. Include in SPCC plan or eliminate as oil storage area.
- e. Clean up the hose leaks outside the dike from gasoline and diesel fuel tanks in Coal Tar tank dike area. Provide drip pan to catch fuel spills. (Correction in process 9/30/98.) Address in SPCC plan or eliminate.
- f. At Blast Furnace "A", where 13 drums of air line oil are stored, include in SPCC plan or eliminate as storage
- g. All tanks of unknown content. Identify contents. Either add to SPCC plan or take out of service. Mark contents on outside of tank according to appropriate labeling regulations.
- h. Replace broken valve lock on N. Scale pit loading dock. Instruct users to keep valves locked. The S. Scale pit unloading dock valve was unlocked, when inspected on 9 24/98. (Correction in progress 9/30/98.)
- i. Clean up grease and oil spillage on ground around Scale Pit and Grease House. (Correction in progress 9/30/98). Limit access to control valves and pumps.
- j. Add grease tote tank storage area near N and S Scale pit and two unknown above ground tanks to SPCC plan, or take out of service. Blank flange pipe on S Scale pit tank, if left in service.
- k. Provide environmental awareness training, including who to call, when faced with an oil spill to the ground.

 1. Review each oil storage area and based on quantities and materials stored, predict the direction, rate of flow and result of a major failure.
- 3. Inadequate SPCC plan. Provides inadequate containment: Containment at the Oil Blending Station on the banks of the Boat Slip, built on a 2 foot grade sloping toward a 3 inch high berm and leading to nearby road drain is not adequate secondary containment. (Correction in progress). At Coal Tar Tanks, diked areas were observed with large amounts of foreign materials, like other storage tanks, iron objects, dirt & brush, taking up part of the engineered space. Dikes around the 20,000 gallon processing oil tank (pickle oil tank) were partly filled with solids, compromising the original volumes. At 18,000 gallon Waste Oil Tank, a.k.a. "smiley tank", repair dike that was holed and cement blocks and mortar that is cracked. (Correction in progress 9/30/98.) The SPCC plan did not address the added tank in this diked area. Two 15,000 gallon waste oil holding tanks located under ground at Schaefer Treatment Plant were not included in the plan. Containment capacities of treatment plants, and booms were not discussed in plan. Countermeasures off site are not addressed. Monthly inspection reports are checked "Satisfactory", "Unsatisfactory", without specifying what this means. I was told leaking or not leaking. If so, several leaks are not being reported and some signs posted and drum labeling are not leaking. Personnel were evidently not trained not to dump oil out on the ground, to notify Environmental Engineering and to locate and

use sorbent materials to clean up spilled oil. We observed areas where oil and grease was spilling on the ground, employees that were unable to locate sorbent materials or spill control equipment and had failed to call Environmental Engineering for help.

Corrective actions:

- a. Remove foreign articles from diked areas. Restore dike to provide for adequate containment. (Correction in progress 9/30/98.)
- b. Repair cracked and broken dikes. (Correction in progress 9/30/98.)
- c. Provide field measurements to verify that all dike volumes are sufficient and take into account precipitation. Insufficient containment areas need to be addressed by either providing additional secondary containment, or an alternative "good engineering practice" that will prevent spills.
- d. Plan did not discuss worst case spill effect on treatment plants and containment barriers. Capacities of these last ditch containment devices (Waste Treatment Plants, lagoons, booms in lagoons and boat slip) are not specified. List oil spill capacity from spillage and precipitation
- e. Plan does not include all oil storage. Oil storage not listed in the plan needs to be inserted and provided for in a certified revision of the SPCC plan.
- f. Specify what is satisfactory and unsatisfactory on Monthly Inspection Reports.
- g. Provide adequate training for employees, so they are aware of where and how to use materials to prevent oil discharges and the rules against dumping and improper disposal.
- 4. Failure to Amend significant changes in the plan. All additions of oil storage tanks, containers and oil storage/staging areas must be addressed in the plan and certified by a P.E. as amendments. Large parts of the plant are no longer operating, and yet tanks within these units are still considered storage tanks. Changes, such as tanks taken out of service should be so noted. Significant changes in facility storage tanks, dikes, operations and procedures need to be addressed in the current plan and addendums recertified.

Corrective actions:

- a. Include all oil storage areas in the facility diagrams and add to inventory list. Delineate those out-of service, in basements, buildings, or otherwise correctly describe and locate all oil storage in the plan. Be sure to reconcile the list of tanks with the tanks plotted on area diagrams.
- b. Evaluate the need for engineering controls, and certify that good engineering practices are being followed.
- c. Get P.E. to certify that out-of-service tanks are empty and are not capable of storing oil.

B. Paper Corrections:

- 1. Number all pages, insert missing pages, remove duplicates, put in order, correct typos and inconsistencies. Change USCG- Grosse Ile throughout, to USCG-Detroit
- 2. Second un-numbered page: Primary Emergency Coordinator, not consistent with list on page 7.
- 3. Forth un-numbered page: USEPA is Response Section 1...(734) -676-6500...also correct typos.
- 4. p.3: with management approval provided, is not same as original p.3. Original page 3 calls for conformance with 40CFR 112.7, which was left off of p.3 substitute. Page 3 doesn't fit with p. 4.
- 5. p.3 (original), correct "double containment dikes" to its true meaning: containment dikes. Tidal Waters???not applicable. Define "visual gauges".
- 6. Table 1. Update plan to include all oil storage areas, and add to inventory list. Delineate those out-of service, or remove from list. Correct tank descriptions and locations on diagrams. (Reconcile the list of tanks with the tanks

plotted on area diagrams.) Table 1, p.1: Coke Plant closed, Table 1, p.4: Caustic is not neutralized by lime stone.

7. p.5e, 10. provide field measurements and dike volume calculations to verify.

8. p.7, public safety agencies, discussed elsewhere...is that: C. Outside agencies on p. 9?

9, p.9, p.14, A-5,: Change MDNR to MDEQ

10. p. 15 what is meant by "individual plants supplement the list (what list) with additional control equipment, such as sand and absorbents." Control equipment = sand? p15. does not fit with p16.

11. p. 18: typo, incomplete sentence.

12. p.A-12 and A-13. If Coke Oven area is closed and form is not being filled out, this form should not be needed, but in fact some tanks and drums are still being actively used. (See A-12, 4. XX Building Area Lubricating Oil Drum Storage found leaking.)

13. P.al6A, DWG No. A-1. XX Lube Oil Shed not shown, Haz. Waste (Lab) tanks not shown.

10 small tanks depicted near Lt. Oil Bld., not found on site. Haz. Waste Tanks (6 of them) shown as three tanks. Gasoline and Diesel fuel tanks in Coal Tar diked area not listed or shown. By-Product Coal Tar, 15,000 gal tanks could not be located.

14. p.A-16b: Where is Oil Storage Tank in FF building noted on p. A-12? Lube tanks and drums in XX Building

C. Misc. Suggestions and comments:

- 1. Make instructions clear and consistent. Decide if Security or Environmental Engineering is the first call.
- 2. A phone fan-out Emergency Contact list might save some time. Present call list has 27 numbers.
- 3. There should be some thought of countermeasures in the event of losses to downstream areas. A emergency contact list including Ford, Power Plant, downstream response resources, Marathon, MPCC, Sunoco. A digest of help-resources available in emergencies, would be useful up-front.
- 4. Find out how can you contact ships, so they won't damage containment systems during a spill? (Correction underway 9/30/98.)
- 5. Replace 40 CFR Part 112, 3/26/76 with 7/1/94 version.
- 6. Put certifications & management approval statements at end of plan..reserving space up-front for emergency instructions.
- 7. A short "Who does what-list" might be helpful? I was confused by responders titles...for example: RSC supervisor, Designated Environmental Representative, Primary Spill Response Coordinators, alternate spill response coordinator, spill response coordinator, environmental representative, environmental services, environmental engineering, primary emergency coordinator, alternate emergency coordinator, Haz-Com Coordinators, Hazard Communication Coordinator, Hazardous Communication Coordinators, Hazardous Communication Representative, designated employee, supervisory personnel are all players, but what do they do? 8. Statements like "stop the leak" and "clean it up" are not helpful to someone who would dearly like to" stop the leak and clean it up". The plan suggests you stop the leak and find some adsorbents. The plan then tells you to clean it up (find a broom and shovel). (Adsorbents, brooms and shovels were not located by Environmental Engineering when we asked to see them.) A central depot where these materials can always be found might work. 9. All employees are called upon to stop the spill and clean it up, but are they all trained? Does RSC really want all employees qualified, trained, certified and practiced to stop and clean up spills? Isn't that what on-site clean up contractors are used for? Employees may need more training on general environmental protection principles, like

not dumping oil out on ground.

10. Do out-side contractors have a good understanding of what they are to do in the event of spillage?

11. Eliminate extraneous oil storage tank placements around the plant by employees and contractors, or bring into

12. For in plant work, who is responsible for what???? Ford Motor Co. is relied upon for...? Ed Levy for?....Central Laboratory Services....?, what do they do? Transportation & Technical Services...? Double Eagle Steel...are they contributors? Telephone numbers to call them should be listed. What does their SPCC plans call for? Are their any conflicts, or are their any chances for mutual benefit? Are there any intra-facility agreements

pertaining to handling oil spills?

13. For emergencies of course call 911, but who are the primary off-site agencies you should notify? NRC...required. PEAS...required. MSO-Detroit...practical...MDEQ-Livonia...practical...City of Detroit/Dearborn...practical. Others are incidental and can be contacted secondarily. USCG, MSO-Detroit will be the OSC responding to spills...you should have his number. Call MDEQ on primary basis also. Don't worry about calling USEPA for oil spills, only for informational purposes. Check with USCG, they have helpful Area Contingency. Plan information on your facility and downstream containment plans.

It is hoped that these suggestions can be useful in opening up discussions and ideas for development of a better and more effective oil spill prevention plan. The EPA inspector is willing to meet with Rouge Steel and their consultant in the near future to resolve any confusion, as needed.

ROUGE STEEL'S RESPONSE TO 2/23/98 INFORMATION REQUEST

DOCUMENT NO. 10

SPILL CONTROL PLAN SECTION IV

GENERAL SPILL RESPONSE ACTIONS

VI. GENERAL SPILL RESPONSE ACTIONS

A. Rouge Steel On-Scene Personnel Responsibilities

Plant personnel are instructed to immediately contact Plant Security in the event of a spill incident. The Plant Security Office is staffed 24 hours per day, 365 days per year, and maintains an up-to-date emergency contact list.

Plant Security - Gate 2 Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121 (313) 317-8888 or (313) 317-8882

Plant security has been instructed to contact Rouge Steel Environmental Engineering [Beeper (313) 714-9501] in the event of a chemical or oil spill.

Because the Rouge Complex contains outfalls that are shared by Rouge Steel Company, DESCO, Power and Utilities, and Ford Motor Company components, the responsibility for any spill cleanup effort to prevent or minimize discharges to surface waters might involve personnel of Environmental Services, Transportation and Technical Services, Ford Motor Company. The Rouge Steel Company Environmental Engineering representative will make this contact if necessary.

Primary Spill Response Coordinator - Rouge Steel Company

1. Environmental Engineer
Office: (313) 323-1260
3001 Miller Road
Room 2110, R.O.B.
Dearborn, Michigan 48121
Environmental Beeper (313) 714-9501 (24 Hrs)

If the primary Response Coordinator cannot be reached, plant security has been instructed to contact an Alternate Spill Response Coordinator in the order listed below:

Don Windeler
 Office: (313) 845-3217
 3001 Miller Road
 Room 2027, R.O.B.
 Dearborn, Michigan 48121

Home: (313) 479- 5227 20630 MAPLEWOOD Court Riverview, Michigan 48192 3. Jim Earl
Charles B. Johnson
Lowell T. Potvin

Office: (313) 323-1260

3001 Miller Road

Dearborn, Michigan 48121 Beeper: (313) 714-9501 (24 hrs)

Other than the notifications to the local public safety agencies, which is discussed elsewhere in this section, it is the responsibility of the environmental representative to notify the appropriate governmental agencies in the event of an environmental incident. The information to be reported includes, but is not limited to, the following:

- a. Reporting individual's name and telephone number
- b. Time, location and type of spill
- c. Amount and types of material(s) involved
- d. Hazard to environment, including media (land, water, etc.)
- e. Containment and clean-up measures taken

See Page 8a for Spill Checklist.

B. Hazard Communication Representatives

The following is a list of Hazard Communication Representatives which are responsible for each of the identified Rouge Steel facilities. Employees are directed to address questions regarding Rouge Steel Company's and the individual facility's Spill Program to these individuals:

Rouge Steel Facility	Representatives	Phone	
Coke Ovens	Ray Childress	(313) 845-8034	
Blast Furnace	Dan Barker	(313) 322-5080	
Basic Oxygen Furnace	Bill McCormick or Elmer Csizmadia	(313) 323-0296	
Electric Furnace	Gerry Gagnon	(313) 322-7797	
Continuous Caster	Doug Fawk	(313) 845-0595	
Hot Strip Mill	Gil Pendolino	(313) 594-1072	
Cold Mills/Pickling Lines	Arley Keppen	(313) 594-7112	
Maintenance (J-9)	Hugh Woodrow	(313) 845-1191	
Environmental Engineering	Charles Johnson	(313) 594-7375	

In addition, Rouge Steel personnel are instructed to report all spill/pollution incidents immediately to Plant Security.

Plant Security		(24-hour)	(313) 317-8888
	•	(24-hour)	(313) 317-8882

Plant-designated environmental representatives have been assigned overall responsibility in coordinating responses to spill/pollution incidents. They are the persons Security has instruction to immediately contact in the event of a spill:

Environmental Engineers

Designated Environmental Representative(DER)

Office:

(313) 323-1260

Beeper:

(313) 714-9501 (24 Hrs)

The DER is responsible for coordinating all emergency responses to spill/pollution incidents, and is familiar with all aspects of the SPCC/PIPP Plan. In addition, the DER has authority to commit the resources necessary to administer the SPCC/PIPP Plan and serve as the principle liaison for the Company to Federal and State regulatory agencies.

In the event of pollution incident or spill which may potentially reach a surface water, the DER will contact Transportation and Technical Services, Ford Motor Company. The following is a list of personnel who may be contacted in such an event:

Contact Person	Office	Home
D.A. O'Connor	(313) 594-1014	(313) 513-2178
Sprv, Environmental Services J.F. Miltz	(313) 337-3511	(313) 453-0948
Environmental Engineer F.D. Vitale	(313) 322-9016	(313) 584-6095
Environmental Engineer Linda LaFleur	(313) 323-0882	(313) 425-5011
Environmental Engineer J.D. Preece	(313) 323-0883	(313) 741-0281

C. Outside Agencies

In the event of an incident which presents a serious hazard to property or public health and safety, the plant Security Office and/or spill response coordinator will notify the following municipal agencies:

Dearborn Fire Department

Dearborn Police Department

Telephone: (313) 943-2218 or 911

Telephone: (313) 943-2240 or 911

Minor medical problems would be handled by the on-site facility:

Rouge Medical Facility

Telephone:

(313) 323-0045

In the event of a significant incident involving personal injury, the emergency facilities of Oakwood Hospital would be used:

Oakwood Hospital 18101 Oakwood, near Southfield Dearborn, Michigan 48124

Emergency Department: (313) 593-7440

The various agencies which would be notified, as appropriate, include the following:

Primary Contacts:

U.S. Coast Guard - EPA

National Response Center

Washington, D.C. **1-800-424-8802**

State of Michigan

Department of Environmental Quality

Pollution Emergency Alert System (PEAS)

(800) 292-4706

Alternate Contacts:

U.S. Coast Guard

Captain of the Port - Detroit

Marine Safety Office

McNamara Office Building Detroit, Michigan 48226

(313) 568-9580

U.S. Environmental Protection Agency, Region V

Michigan-Ohio District Office

9311 Groh Road

Grosse Isle, Michigan 48138

(313) 676-6500

Michigan Department of Natural Resources

S.E. Michigan District Office 38980 Seven Mile Road

Livonia, MI 48152

(313) 953-0241

In the event that undesirable materials have been, or are likely to be discharged to the sanitary sewer system, the following agencies are also to be notified:

Detroit Water and Sewage Department Industrial Waste Control Section 303 S. Livernois

Detroit, MI 48209

(313) 297-9438 (Days) or 297-9493 Telephone:

(313) 224-4775 (24 Hours)

(Report spill within 24 hours)

Dearborn Water Department Telephone: (313) 943-2307

DOEPKEN KEEVICAN & WEISS Professional Corporation Attorneys at Law 58th Floor, USX Tower

600 Grant Street Pittsburgh, Pennsylvania 15219

(412) 355-2609 Telex: 6503761340

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Mr. Ross E. Powers Mr. Don Windeler	(734) 692-7677 (313) 845-3217	(313) 323-2270
CLIENT/MATTER:	ROUGST/ENV	
FROM:	Roberta R. Wilson	
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March 25, 1999

Ms. Beverly J. Kush
Chief, Oil Planning and Response Section
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: SE-5J/OPRS-SPCC W37801

Re: SPCC Information Request/Rouge Steel Company

Dear Ms. Kush:

On behalf of Rouge Steel Company ("Rouge Steel"), we are responding to the January 20, 1999 request for information by the United States Environmental Protection Agency ("EPA") pursuant to Sections 311(m) and 308(a) of the Clean Water Act, 33 USC § 1321(m) and § 1318(a) (the "1999 SPCC Information Request"). This response is being submitted in accordance with Gaylene Vasaturo's letter of February 12, 1999, in which she confirmed that EPA would allow Rouge Steel a 30-day extension of time in which to respond. This extension of time was requested because of the February 1, 1999 power plant explosion which has placed extraordinary demands on Rouge Steel's technical staff in undertaking emergency response measures. Rouge Steel would like to take this opportunity to express its appreciation for EPA's cooperation in giving Rouge some additional time to respond. Additionally, Rouge Steel would also like to mention that Mr. Ross Powers has been very helpful in explaining the technical issues raised in the course of EPA's inspection and in the SPCC Information Request. Rouge Steel relied heavily upon Mr. Powers' comments in Attachment B to your letter in developing the response activities the company is now presenting.

As a threshold matter, Rouge Steel notes that your January 20, 1999 letter states that Rouge Steel must make a determination pursuant to 40 CFR § 112.20(a)(2) as to whether the facility could reasonably be expected to cause substantial harm to the environment ("substantial harm could reasonably be expected to cause substantial harm to the environment ("substantial harm facility"). Rouge Steel previously complied with this requirement when it submitted a Certification of the Applicability of Substantial Harm Criteria to EPA on March 14, 1996. This submission, in which Rouge Steel certified that it was not a substantial harm facility, was made in response EPA's February 8, 1996 Request for Information pursuant to Sections 311(m) and

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Ms. Beverly J. Kush March 25, 1999 Page 2

308(a) of the Clean Water Act, 33 USC § 1321(m) and § 1318(a) (the "1996 SPCC Information Request"). No notification was ever received by Rouge that EPA did not accept this Certification. Notwithstanding this prior submission, Rouge Steel is submitting a new Certification in connection with this response to the 1999 SPCC Information Request.

Your January 20,1999 letter also states that a sample form has been enclosed which can be attached to Rouge Steel's SPCC Plan to document that the required three-year review has been completed. However, Rouge Steel's last amendment to its SPCC Plan was completed on June 30, 1997. Copies of the amendments which Rouge Steel proposed to include in the 1997 SPCC Plan had been submitted to EPA in response to the 1996 SPCC Information Request. However, no comments were received from EPA concerning these proposed amendments. Additionally, a copy of the certification by a Registered Professional Engineer of the 1997 SPCC Plan was submitted to EPA on July 1, 1997. Accordingly, the 1997 SPCC Plan was not required to be reviewed under 40 CFR § 112.5(b) until June 30, 2000.

EPA has, however, requested a number of additional revisions to Rouge Steel's 1997 SPCC Plan in the 1999 SPCC Information Request. Rouge Steel will, therefore, submit an Amended SPCC Plan which will be recertified by a Registered Professional Engineer in accordance with this response and Rouge Steel's SPCC Plan Amendment and Implementation Schedule ("Schedule"), a copy of which is enclosed with this response. This recertification of Rouge Steel's SPCC Plan in June of 1999 will accordingly extend the time period for the three year review to June, 2002.

The alleged deficiencies noted in EPA's request for information appear to be based largely upon a subjective interpretation of what the SPCC Regulations, 40 CFR Part 112, require and how these requirements can be best implemented. Rouge Steel has attempted to comply with EPA's comments and suggestions for curing these alleged deficiencies without determining whether they are strictly required by the SPCC Regulations. Accordingly, in amending the SPCC Plan and implementing this amended plan in response to the points raised in the 1999 SPCC Information Request, Rouge Steel makes no admission of fact or liability concerning the violations and deficiencies asserted by EPA.

Additionally, Rouge Steel presently does not have sufficient information to determine whether EPA's assertion that the 1999 SPCC Information Request is not subject to the Paperwork Reduction Act. Accordingly, in providing this response, Rouge Steel does not waive any claim or defense that may have that EPA has failed to comply with the requirements of the Act.

With respect to Attachment A of EPA's 1999 SPCC Information Request and the violations of the SPCC Regulations which EPA asserts were found during an inspection on September 24, 1998, Rouge Steel responds as follows:

Ms. Beverly J. Kush March 25, 1999 Page 3

Rouge Steet's Response to Attachment A

For failure to implement the facility's SPCC Plan:

The schedule for implementing Rouge Steel's SPCC Plan, as amended in 1999, is listed as Section I of the enclosed Schedule.

2. For failure to Amend SPCC Plan:

Rouge Steel implemented the SPCC Plan as finally amended in 1997, in accordance with the submissions made to EPA in 1996 and 1997. EPA's 1999 SPCC Request for Information has identified additional revisions which EPA is requesting be made to Rouge Steel's SPCC Plan. An amended SPCC Plan, recertified by a Registered Professional Engineer and approved by management, together with a certification of implementation will be submitted to EPA in accordance with this response and Section II of the enclosed Schedule.

For inadequate SPCC Plan:

With regard to the specific deficiencies EPA raises in paragraph 3 of Attachment A, Rouge Steel responds as follows:

40 CFR § 112.7(b) - Failure to predict the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each major type of equipment failure.

Activities which will be undertaken in response to these alleged violations are listed in the Schedule as items 1 and 2 under 40 CFR § 112.7(b) of Section III.

40 CFR § 112.7(c) - Failure to provide adequate secondary containment and/or diversionary structures or equipment if practicable; including sorbent materials.

Activities which have or will be undertaken in response to these alleged violations are listed in the Schedule as items I through 9 under 40 CFR § 112.7(c) of Section III. As noted in the Schedule, no action has been taken with regard to what EPA has referred to as foreign materials within the dikes around the coal tar tanks because the three tar storage tanks within the dike are closed tanks and, therefore, not subject to the secondary containment requirements of the SPCC Regulations. However, as a point of reference, these materials, which consist primarily of vegetation and a few small pieces of obsolete

Ms. Beverly J. Kush March 25, 1999 Page 4

equipment, could have theoretically displaced only a few hundred gallons of the total dike capacity of nearly 2,000,000 gallons.

40 CFR § 112.7(e)(2) - Failure to provide complete discussions and/or implement requirements pertaining to Bulk Storage Tanks.

Activities which have or will be undertaken in response to these alleged violations are listed in the Schedule as items 1 through 9 under 40 CFR § 112.7(e)(2) of Section III.

As a general matter, Rouge Steel believes that the company is not required to respond to most of the issues raised by EPA concerning the coke plant tanks because that facility was shut down in 1987. Detailed records of the shutdown measures taken in late 1987 and early 1988 after operations ceased have not been found. However, it is known that the tanks in the coke plant were pumped out and the products, including those in the tar storage tanks and the light oil tanks, were sold. Additionally, waste materials from the tanks were sent offsite to a licensed waste disposal facility. A number of the tanks, including the coke oven gas drip tanks, which are labeled, "Lab"/"Hazardous Waste (XIX)" were visually inspected and found to be residual free. All gas lines were blanked off and then purged with nitrogen. Certain portions of the byproducts plant were also steam cleaned or pressure washed and drained. Drains and drain valves to all tanks were closed. Rouge Steel believes that the measures taken to close the tanks within the coke plant, particularly in this instance with regard to the gas line drip tanks, the tar storage tanks and the light oil tanks, were at the time consistent with the applicable regulations, industry standards and good commercial practice.

EPA has asserted that Rouge Steel has violated 40 CFR §112.7(c)(2) because the tanks marked "Lab"/"Hazardous Waste (XIX)" are not mentioned in the SPCC Plan. However, these tanks have appeared in every version of the Rouge Steel's SPCC Plan in Table I as "Condensate Drip Water" tanks. It is believed that the "Lab"/"Hazardous Waste (XIX)" labels were placed on the tanks while they were in use as a precautionary measure and do not necessarily accurately describe the former contents of these tanks. Rouge Steel believes that these tanks, although listed in the SPCC Plan, are not subject to the SPCC requirements because they are closed tanks and, additionally, they did not hold oil during the period when they were in operation.

EPA has also asserted that coke plant tanks no longer in use need to have piping disconnected to eliminate the need to develop a Facility Response Plan ("FRP"). However, Rouge Steel does not believe that the volume of the tanks within the coke plant, particularly the tar storage tanks and light oil tanks, should be included in the calculation of the facility's total oil storage capacity for the determination of whether an FRP must be

Ms. Beverly J. Kush March 25, 1999 Page 5

developed. These tanks were out of operation and closed before the effective date of the FRP requirements. Additionally, the interior of these tanks was recently visually inspected and all tanks are empty. Rouge Steel also does not believe that the material which was formerly stored in the tar storage tanks falls within the definition of "oil" under 40 C.F.R. §112.2.

Notwithstanding Rouge Steel's stated position, because EPA has asserted that the pipelines must be disconnected in order to eliminate the need to develop an FRP, Rouge Steel has undertaken measures to blank off the delivery and discharge pipelines to the two light oil tanks and the three tar storage tanks. This has been certified by a Professional Engineer. Subtraction of the volumes of these tanks reduces the theoretical oil storage capacity by over 2,000,000 gallons and reduces Rouge Steel's total oil storage capacity to below the FRP threshold of 1,000,000 gallons.

EPA has also asserted that Rouge Seco has violated 40 CFR §112.7(e)(2) because two 15,000 gallon underground storage tanks at the Schaefer Treatment Plant are not discussed in the SPCC Plan. These structures are not, however, underground storage tanks but are, instead, concrete oil separators constructed as part of the basement structure of the building. MDEQ has previously contented in this determination. As such, these structures are not subject to the SPCC Regulations because they are not tanks and also because they are not expected to pose any task to navigable waters. Nevertheless, for reference purposes, Rouge Steel will identify these oil separators in the SPCC Plan.

40 CFR § 112.7(e)(2)(vi) Paintre to test above ground tanks by hydrostatic testing, or visual inspection of shell thickness testing (with comparison records maintained);

Activities which will be undertaken in response to this alleged violation are listed in the Schedule as item 1 under 40 CFR § 112.7(e)(2)(vi) of Section III.

40 CFR § 112.7(e)(2)(x) - Pailure to promptly correct visual oil leaks from tanks and related equipment.

Activities which will be undertaken in response to these alleged violations are listed in the Schedule as item 1 under 40 CFR \$ 12.7(e)(2)(x) of Section III.

§ 112.7(e)(9) - Security (excluding dil production facilities)

Ms. Beverly J. Kush March 25, 1999 Page 6

(ii) - Failure to securely lock master flow and drain valves in the closed position or any other valves that will permit direct outward flow of the tanks contents to the surface when in non-operating or non-standby status.

Activities which have been be undertaken in response to these alleged violations are listed in the Schedule as item 1 under 40 CFR § 112.7(e)(9)(ii) of Section III. Locks had been placed on the valves in the Scale Pit as part of Rouge Steel's 1997 SPCC Plan. However, during the inspection, one lock was found to be broken and one lock was missing. These locks have now been replaced. It should be noted, however, that there are no valves in the Grease House which would require locks.

§ 112.7(e)(9)(iii) - Failure to lock in the off position or make accessible only to authorized personnel starter controls on all oil pumps in a non-operating or nonstandby status.

Activities which have been undertaken in response to these alleged violations are listed in the Schedule as item 1 under 40 CFR § 112.7(e)(9)(iii) of Section III. Locks had been placed on the oil pump in the scale prefas part of Rouge Steel's 1997 SPCC Plan. However, during inspection, it was found that two locks had been removed and not replaced. These locks have now been replaced. With regard to the Grease House, Rouge Steel does not believe this pump could direct an outward flow of grease, however, restricted access signs have been posted in the area.

§ 112.7(e)(9)(iv) - Failure to securely cap or blank-flange loading/unloading connections of oil pipelines when not in service or on standby status for an extended time period.

Activities which have been or will be undertaken in response to these alleged violations are listed in the Schedule as item 1 under 40 CFR § 112.7(e)(9)(iv) of Section III.

§ 112.7(c)(10)- Personnel, training and spill prevention procedures.

Failure to properly instruct personnel in the operation and maintenance of equipment used to prevent oil discharges and in the pollution control laws, rules and regulations.

Activities which have been undergaten in response to these alleged violations are listed in the Schedule as item 1 under 40 CFR § 112.7(e)(10)(i) of Section III.

Rouge Steel has also enclosed a Certification by Donald S. Windeler that all materials and statements submitted along with this letter response are true and accurate. We trust that EPA will

Ms. Beverly J. Kush March 25, 1999 Page 7

find that this response adequately addresses all issues raised in the 1999 SPCC Request for Information. However, should you have any questions regarding this response, please direct your inquiries to either Scott Dismukes (412-355-2641) or Roberta Wilson (412-355-2979).

Very truly yours

Cotech R. Wilson

RRW/lmc

cc:

Mr. Ross E. Powers Mr. Don Windeler Scott R. Dismukes, Esq.

- Marie -	SPCC PLAN AMENDMEN	ne 48 81		TEMENTATION SC	HEDULE
ROUGE STEEL S	SPCC PLAN AMENDMEN BPA 1998 INSPEC	TON		SUES	
	EDE 1/2 E 7		113		SCHEDULE
EPA ITEM	ACTIV		Ì		Secretary Address of the Secretary Address of
TTACHMENT A		S			
TELACTIVE IN			1		. Box
Asserted Deficiencies	<u>. </u>				Submitted.
· · · · · · · · · · · · · · · · · · ·	Schedule of	ompli	et	on.	Satimation
Failure to Implement SPCC			1	Li Control de la Control de	omplete by June 18, 1999.
Plan	Amended SPCC Plan				omplete by same 19;
I. Failure to Amend SPCC		ı, Met	博	provals.	Į.
Plan	Compation 200	Certif	ida	tion of date of	
\	6.0 implementation		: H.F		Submitted.
	Schedule of	Comp	leij	on.	Subminee.
III. Inadequate SPCC Plan					
b.			ij		
SPCC Plan Items					1 4 1000
40 CFR 112.7 (b)	Draft Potential Oil Equipme	at Fair	Lill.	Scenario for active	Complete by April 30, 1999.
1. Predict Direction, Rate of	Draft Potential Oil Equipme aboveground storage tanks	Assum	iet	he breach of any	
flow, and total quantity of oil	secondary containment.		•		
flow from major equipment	i i		: []		
failure	Tanks will be cither: marke	A and		led to the Plan, or	Complete by April 30, 1999.
2. Unmarked tanks not	Tanks will be cittler: islande marked "Out of Service" an	d disc		ected or removed.	
included in SPCC Plan (Photos	marked "Out of Service 2				·
14, 14a, 15, 16, 21, 23, 26, 28,					
29, 31)		i i	1		
40 CFR 112.7 (c)	1			h controlly located in	Complete by June 18, 1999
1. Location of sorbent material	Pallets of sorbent materials	nave		Lame years This	
1. Location of borses	Pallets of sorbent materials the Rouge Operations War	enouse	4	C Dies for fitting	
] - -	location will be included in	the 5	1		
	reference and training.	ļ. <u></u>	<u> </u>	Landiane will either	Implemented and ongoing.
2. Secondary containment for	Portable tanks used for ten	borge	۴ د	beamed or be	
portable tanks	I ha toograd in structural COI	Kunni 1	ie H	3 Designed, or so	
portable tanks	fabricated to include secon	Hary	CO	anment.	
3. Foreign material in coal tar	Tank	g with	un 🏻	Se dike are closed and	<u> </u>
3. Foreign material in com	F A subject to SPEC SECON	DATA I	CUM	SETTITIONE	
tanks dike	L Additional	lv tab	KΒ	DING HER DECH	
1					Complete. Inspections
1	Material removed restori	ig dike	e to	its original capacity.	ongoing.
4. Foreign material and oil	1		5		ougomg.
spills in Hi Lo shop oil dike					The Investigate
(Smiley waste oil)	Material removed restori	ne di	e to	its original capacity.	Complete. Inspections
5. Foreign material in pickle		1 11	1 6 5	i k	ongoing
oil tank dike	Height of berm wall was	incre	se	to accommodate a	Notified EPA of Completion
6. Inadequate berm Oil	F			DEC CAUACILI OZ 445	November 13, 1998. No
Blending Station	largest tank stored in the	Stati	n v	hich is not in its own	further action required.
-	B 1 5:11	1 1 11		J E	1.000
	structural dike. Work underway to evalu	ote th	F. 74	ed for locating the	Complete by May 24, 1999.
<u> </u>		POPEC CITY	***	Signaturet secondary	1
7 Secondary containment for	1 - 4 1 - 4 4 5 5 7 7 7 7 7 7	ar fie	7411	MAY THIST DOC 3000 >	1
7. Secondary containment for	1 - 4 1 - 4 4 5 5 7 7 7 7 7 7	ar fie	7411	MAY THIST DOC 3000 >	
all tote tanks/barrels storage	tanks/barrels at these sub containment, and includ	ar fie	7411	MAY THIST DOC 3000 >	
7. Secondary containment for all tote tanks/barrels storage areas. Tote tanks/oil barrel storage not addressed in SPC	tanks/barrels at these sub containment, and includ	ar fie	7411	MAY THIST DOC 3000 >	

		(CHARLIE E
	SPCC PLAN AMENDMENT & I	PLEMENTATION	SCHEDOLE
ROUGE STEEL	SPCC PLAN ANIE WATER	SSUES	SCHEDULE
	ACTIVITY		2CHEDODE
EPA ITEM	B de la	illensirs were	Complete. Inspections ongoing.
MANAGUICIACION CONTRACTOR I	Dike wall was inspected and massall completed to restore integrity of the	eintainment. Hi Lo	ongoing-
Lo waste oil tank (Smiley	Shop.		Complete Inspections
waste nil tank)	Shop. Oil-stained material removed rester	dike capacity.	ongoing.
v vig granner zojio maa. –	OII-Statiled metal		VII.BOZZ-B-
Smiley Waste oil and Pickle	<u> </u>		
Oi) dikes		Toble I	Not applicable.
40 CFR 112.7(e)(2)	These tanks are listed in the existing	PEDCC Nam 18010 1	
1. "Lab"/"Hazardous	These tanks are listed in the existing as "Condensate Drip Water" tanks been used nor are they piped for our been used nor are they piped for our purely sheated in the	They have hever	ي ننظن
Waste(XIX)" tanks not	heen used nor are they piped for o	A to plant and not	
mentioned in SPEC Plan	they are closed tarted 1	î îlî	
	subject to SPCC Requirements. This was an unused oil storage tar	rest to will be removed	Complete by April 23, 1999.
TE E Chatt	This was an unused ou storage an	WALL ALL DO	<u> </u>
2. Tank in Hi Lo Shop	and serapped.	j 111	10.1000
("Smiley") tank dike not mentioned in SPCC Plan	This a single storage area which	Though in Drawing G-	Complete by June 18, 1999.
mentioned in SECO 225	This a single storage area which	Table 1.	
3. Hot Strip Mill/Grease Housewaste oil area - tote	1 of the Plan, but was not instruction		\
tanks and barrels not	Work underway to evaluate the design/construct secondary construct	intent and include in	li li
mentioned in SPCC Plan	design/construct secondary con-		
Includitor in or or	the SPCC Finites 1-54	This may have	No further action required
4. Totes outside tandem mill	There is no storage area at that the been a delivered tote which was	awaiting relocation to	No further action responses
not mentioned in SPCC Plan	been a delivered toto will		Complete by June 18, 1999.
1	process area. Work underway to evaluate the	ne d for locating drums	Complete by June 10, 1991
5. Drums at Blast furnace "A"	L	Codebas 1	d 1
not mentioned in SPCC Plan	at this site, design constant as re-	uited.	
	include in the SPCC Plan as re All drums were removed; the	carbicaned and used for	No further action required.
6. XX building oil storage			No turner and
shed not mentioned in SPCC		1111	Complete by June 18, 1999.
Plan	One of these fuel tanks has be	n formed to the fuel	
7. Fuel tanks in coal tar dike	One of these tue; tares has be	Deput tank is awaning	in l
not mentioned in SPCC Plan	rejocation to a new commissing	of must will be member	
4	the SPCC Plan.		
La colongia	inin_	Her ledillements	e Complete.
8. Coke Plant tanks no long	However, intake and outflow	Diamines to 1 fer atorne	
in use need piping	and 2 light oil tanks have the	the constact as nart	of
disconnected. 9. USTs at Schaefer Treatm	A T TRANSPORT	Organismicico as part	are t
9. USTs at Schaerer Fredhis Plant not discussed in SPCC	the basement structure of the	bliffing. As such, and	to Complete by June 18, 1999.
Plant not discussed in 52 of Plan (2x15K waste oil)	not subject to SPCC regulati	Hamilton of the same	<u> </u>
Plan (2x13k waste 513)	pose risk to navigable water However, for purposes of re	they will be	
	However, for purposes of the	Line Control	
ţ.	identified in the SPCC Plan	1 2 10	
40 CFR 112.7(e)(2)(vI)	ual Revise the Monthly Inspect	hall browns to specify lead	\$ 1000
1 Monthly Records of vis	- (alaan 1978	amisecondary contain	ment Complete by April 16, 1999
- and an of shovedrough	condition, repairs, clean up	1	į. į
tanks are without delimited	JLI GII		ī. :
satisfactory of unsatisfact	ory [
condition.			The took OR
40 CFR 112.7(e)(2)(x)	rrect Stained surface cleaned, an	h will pans placed to p	revent Complete Inspection
1 Egiture to promptly co		let the drips	ongoing.
wigned oil leaks from tank	(3, 5. ~	_	
and related equipment -	Coal		
age and a			
		IN C AMP	

_		PEDI EMPNIATION	SCHEDULE
ROUGE STEEL	SPCC PLAN AMENDMENT & EPA 1998 INSPECT OF	SESTIES SECTION	
		The state of the s	SCHEDULE
EPA ITEM	ACTIVITY		No further action required.
	All drums were removed; the area of	Paned and used for	Mo Intelest action redesizes.
PRIMIPLIA CONTACT 116——	other purposes.		
PAKS AL CICALIFUD SPILIF 1			Complete. No further action
puilding shed (photo #26,27)	The subject spill from hydraulic at	outside of waste ou	required.
3. LYOHINGIA COTTAL	The subject spill from aydravite as storage area was cleaned and the storage area was cleaned and the storage area.	was scrapped.	required.
leaks & clean-up spills in	Storage a.o.		<u> </u>
hazardous waste & waste oil			t ·
drum storage pad (photo			Complete.
#10,11,24)	Photograph refers to area inside	Shop rank dike.	Compression
4. Promptly correct visual	See 40 CFR 112.7(c) item 9 of set	identie.	
leaks & clean-up spills inside			_
waste oil dike (photo #14,	<u></u>	A alexand System	Complete. Inspections
14a) 5. Promptly correct visual	Oil stained debris removed and su	PACE CICALICO. DESPESS	ongoing.
leaks & clean-up spills inside	Oil stained debris removed and totes were removed for inspection	High any necessors	
Oil Biending Station berm	repair.		
(photo #3, 4, 5, 6, 6a)	1 = : : i i i i i i i i i i i i i i i i i	The start with smill	Complete, Inspections
6. Promptly correct visual	This condition was reviewed and	Carrected with share	ongoing.
leaks & clean-up spills in	pans.		
grease house			<u> </u>
(photo #19,20)		desce drain and take	Complete by May 14, 1999.
7. Promptly correct visual	Review area access, condition of	Array orez	
leaks & clean-up spills in slab	out of service as required, and		e.
mill basement and Hydraulic			
Pump room			
40 CER 1127(e)(9)(ii)	Locks replaced where required	derevent outward flow	Complete. Inspections
1. Scale Pit and Grease House-			ongoing.
unlocked valves	event		
AD CER 112.7(e)(9)(iii)	Locks returned to primp switch	stand Grease house	Complete. Inspections
1. Scale Pit and Grease House	Locks returned to pearly street		ongoing.
Unsecured Pump switches	access securco.		14 1000
40 CFR 112.7(e)(9)(iv)	Flange has been blanked off.	hite tanks are out of	Complete by May 14, 1999
1 Tank in scale pit area	Flange has been thaken but service, and will be either diss	meeted and labeled "o	ut
nineline not blank flanged	of service", or removed and se	rasped.	
(phote #18)	of service , or round		on Complete by 4th Quarter
40 CFR 112.7(e)(10)(l)	The market than	to reinforce identification	on Complete by 4" Quartor
1. Employee training needed	of corbent materials and to sta	ingsize the importance	of 1999.
in location and operation of o	of sorbent materials and to so notification, control and clear ground. Updated Emergence including elements of the SP	up of leaks or spills on	the t
spill control equipment and	ground Updated Fancipency	Response Training,	. \
materials	including elements of the SP	Can was implement	eq.
•			.
la de la companya de	quarter 1999 to include all 30	do approx.) RS€	
	employees.		

CPETIFICATION:	op	AL PARTIES.	LANK	DETERMINATION	FORK
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		Range	TEEL.	COMPANY	<u> </u>	
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		<u>Dearborn</u>	MICH	GAN 48121	·	
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1.	42.000.galle	ons and do the	erations	incings over ages see cabacith Elette	transfers of oil	
•	to or from	vessels?		•	. X	
		Ĭ				
2.	Does the fac	ility have a sat	stor stor	ge capacity greate	es laupe to made	
	ene million	1.000.000) as	erround	ge capacity greate: is the facility torage area suffi	rithvit lecondary . Ligadiy lasma to	
_	contain the	capacity of the	lergest	abovegtound storag	tank within the	
	scorage area	87	YES		5. X	•
		<u> </u>			CHARLES AND ASSESSMENT OF THE PARTY OF THE P	
· 3.	Does the fac	illity have a ma	STOR STOR	ge capacity greater the facility local formula in Attack able by the RA) suc to an environmental	then or equal to	
	one militon	(1,000,000) gal	lons said	the facility local formula (e. Arrach	ced et é distance	
	(we catenta	formula conside	red accep	able by the BA) suc	t Chat a discharge	
	from the fac	filty could cau	e injury	to an envilonmental	ly sensitive area	, · .
• *	as defined i	in Appandiz D?	YB5	B3-	<u> </u>	
		:				
· L s.	Does the fac	LLLEY BEVO & BALL	in a star	go capacity greater the famility loca formula in Artacl	F Chan of equal to	
	(es calcula	ted using the a	poroprikt	formula in Actael	ment C-III or an	
	alternative	formula considu	Tac Beth	able by the RA) suc public drinking war	d adar e ciscuelle	
	fion the rec	CTTTEN ADMITT BUT	YEZ		0	
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5_	Does the tac	:1115y nave a ma: (1.000,000) #4	llone spi	ge capacity greate within the pest I in an execut gre	or enem or equal to	
	facility ex	perienced a repo	rteble ep	l in an assunt gre	iter than or equal	
:	to 10,000 gr	allons?		- 25. • • • • • • • • • • • • • • • • • • •	o X	
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CERTI	FICATION			Liesanille Avestas	A and an familiar	
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Those	individuals	responsible for	detainin	this information.	I believe that the	•
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D.	5. Windel	ler		3-25-99		
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121 **Earthication of** Range Steel Company's Response to brmation Request Pursuant to 33 U.S.C. §§ 1321(m) and 1318(a)

I, Donald S. Windeler, Manager, Environmental Engineering, Rouge Steel Co., and as authorized by Rouge Steel Company, hereby certify that Rouge Steel Company's March 25, 1999 Response to the Information Request Pursualt to 33 U.S.C. §§ 1321(m) and 1318(a) was prepared under my direction or supervision to assume that qualified personnel gathered and evaluated the information necessary for this certification. I have personally examined and am familiar with the information submitted in responding to this information request for production of documents. Accordingly, based on my review of the documents and the written Response to the Information Request and to the best of my knowledge and belief formed after my reasonable inquiry of these qualified personnel and taking into consideration the time permitted to respond to the Request for Information, I believe the information submitted is true and accurate.

REUGE STEEL COMPANY

Donald S. Windelex

Rouge Steel Company

Manager Environmental Engineering

Date: March 25, 1999

omito befose me

this 25th day of March, 1999

Maine Cognij

My Commits Michigan



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

March 25, 1999

To Whom It May Concern:

The following tanks at the Rouge Steel Company Coal far Storage area at 30001 Miller Road Dearborn, Michigan, have been rendered incapable of ou storage by blanking off delivery and discharge lines for the tanks:

> <u>Description</u> Tar Tanks #1 and #3 Tar Tank #2 Light Oil Tank #1 Light Oil Tank #2

Nominal Conacity 500,000 sallons each 900,000 sallons 240 000 allons 230,000 kallons

Vinteler, P. B.

Environmental Engineering

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ATTN: FLANAGAN

IN DATE

Statement Date: MAR 31 1999

DUNS: 00-577-8980

ROUGE STEEL COMPANY (INC)

(SUBSIDIARY OF ROUGE

INDUSTRIES INC, DEARBORN,

MI)

PO BOX 1639
DEARBORN MI 48121
3001 MILLER ROAD
AND BRANCH(ES) OR DIVISION(S)
DEARBORN MI 48120

TEL: 313 390-6877

DATE PRINTED SUMMARY
JUL 19 1999 RATING -

MFR FLAT ROLLED STEEL PRODUCTS SIC NO. 33 12

STARTED 1997 WORTH F \$451,699,000 EMPLOYS 3,119

(3,119 HERE) HISTORY CLEAR

CHIEF EXECUTIVE: CARL L VALDISERRI, CHMN & CEO

SPECIAL EVENTS

02/16/99 FIRE or OTHER DISASTER: According to published reports and a source contacted, Rouge Steel Company, located a 3001 Miller Rd, Dearborn Rd, endured an explosion and fire on February 1, 1999, which resulted in the loss of electricity, steam and other utilities. The dollar damage amount is undetermined. The company is insured. The extent of coverage is undetermined. The company is not operational at this time.

OTHER SPECIAL EVENT: According to published reports, Rouge Steel Company resumed limited finishing operations production at its hot strip mill and cold mills on February 11, 1999.

02/02/99 FIRE or OTHER DISASTER: According to published reports and a source contacted, Rouge Steel Company, located a 3001 Miller Rd, Dearborn Rd, endured an explosion and fire on February 1, 1999, which resulted in the loss of electricity, steam and other utilities. The dollar damage amount is undetermined. The company is insured. The extent of coverage is undetermined. The company is not operational at this time.

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If you have questions about this report, please call our Customer Service Center at 1-800-234-3867 from anywhere within the U.S. If you are outside the U.S., contact your local D&B office.

*** Additional Decision Support Available ***

Additional D&B products, credit recommendations and specialized investigations are available to help you evaluate this company or its industry. Call Dun & Bradstreet's Solution Center at 1-800-362-3425 from anywhere within the U.S.

* * * SUMMARY ANALYSIS * * *

The Summary Analysis section reflects information in D&B's file as of July 19, 1999.

RATING SUMMARY

The absence of a Rating (--) indicates that the information available to D&B does not permit us to assign a Rating to this business. In this case, no Rating was assigned because of D&B's assessment of the company's financial ratios and its cash flow.

Below is an overview of the company's D&B Rating(s) since 09/19/97:

RATING DATE APPLIED ------ 09/19/97

* * * PAYMENT SUMMARY * * *

The Payment Summary section reflects payment information in D&B's file as of the date of this report.

The PAYDEX for this company is 57.

This PAYDEX score indicates that payments to suppliers average 25 days beyond terms, weighted by dollar amounts. When dollar amounts are not considered, approximately 57% of the company's payments are within terms.

Lalow is an overview of the company's dollar-weighted payments, segmented by

its suppliers' primary industries:

	TO TO T	TOTAL	LARGEST	% 1.7 / T.N.		DAYS S	SLOW	
	TOTAL RCV'D	DOLLAR AMOUNTS	HIGH CREDIT	W/IN TERMS	<31	31-60	61~90	91+
	#	\$	\$	0,0	%	%	%	o _l o
Total in D&B's file	195	33,751,150	15,000,000)				
Top 10 Industries:								
1 Whol metal	11	458,500	300,000	14	66	8	12	~
2 Whol electrical equi	p 10	918,750	400,000	16	68	_	5	11
3 Whol industrial supp	1 9	1,520,250	1,000,000	52	-	35	12	1
4 Petroleum refining	8	868,100	600,000	63	1	35	1	_
5 Steel works	6	3,780,000	2,000,000	71	26	-	-	3
6 Nonclassified	6	521,050	500,000	52	48	-	_	_
7 Clay refractory	2	1,800,000	1,000,000	22	28	-	-	50
8 Mfg industrial gases	1	15,000,000	15,000,000) ~	100	-	-	-
9 Mfg readymix concret	e 1	4,000,000	4,000,000	50	-		50	_
10 Electric services	1	2,000,000	2,000,000	100	_	-		
11 OTHER INDUSTRIES	126	2,332,450	300,000	44	27	2	4	23
Other Payment Categorie	ន:							
Cash experiences	5	1,500	750)				
Payment record unknown	9	550,550	500,000)				
Unfavorable comments	0	0	()				
Placed for collection								
with D&B	0 -	0						
other	0	N/A						

The highest "Now Owes" on file is \$3,000,000 The highest "Past Due" on file is \$2,000,000

Dun & Bradstreet has 195 payment experiences in its file for this company. For your convenience, we have displayed 80 representative experiences in the PAYMENTS section.

YMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

Antic - Anticipated (Payments received prior to date of invoice)

Disc - Discounted (Payments received within trade discount period)

Ppt - Prompt (Payments received within terms granted)

REPORTED		HIGH	MOM	PAST	SELLING	LAST SALE
	RECORD	CREDIT	OWES	DUE	TERMS	WITHIN
07/00	D:	1000000	7500	1000		7. 36
07/99	Disc	1000000	7500	1000	370.0	1 Mo
	Ppt	1000	-0-	-0-	N30	6-12 Mos
	Ppt	250	250	- 0 -		1 Mo
•	Ppt	100	-0-	-0-	370.0	4-5 Mos
	Ppt	100	-0-	-0-	N30	4-5 Mos
	Ppt-Slow 30	5000	5000	2500	N30	1 Mo
	Ppt-Slow 30	750	250	- 0 -		1 Mo
	Ppt-Slow 30	50	50	- 0 -	N7	1 Mo
	Ppt-Slow 60	1000	500	-0-		1 Mo
	Ppt-Slow 90	55000	5000	500		1 Mo
	Slow 30-60	1000	1000	750		1 Mo
06/99	Disc	5000	-0-	-0-		2-3 Mos
	Disc-Ppt	50000				
	Ppt	70000	-0-	-0-		6-12 Mos
	Ppt	35000	35000	-0-		1 Mo
•	Ppt	5000	5000	- 0 -		1 Mo
	Ppt	5000	~ 0 ~	- 0 -	1 10 N30	2-3 Mos
	Ppt	2500	- O -	-0-		2-3 Mos
	Ppt	2500	-0-	- 0 -	1/2 10 N30	2-3 Mos
	Ppt	1000	1000	-0-	N30	1 Mo
100	Ppt	1000	-0-	-0-	N30	1 Mo
	Ppt	1000	500	- 0 -	N30	1 Mo
	Ppt	750	750	- 0 -	N30	1 Mo
	Ppt	750	750	-0-		1 Mo
	Ppt	500	- O -	-0-	1 10 N30	2-3 Mos
	Ppt	500	500	-0-	N30	1 Mo
	Ppt	500	-0-	- 0 -		6-12 Mos
	Ppt	500	100	-0-		1 Mo
	Ppt	250	250	- 0 -	N30	1 Mo
	Ppt	250	100	-0-	N30	1 Mo
	Ppt	250	-0-	-0-		4-5 Mos
	Ppt	50	-0-	-0-	N30	6-12 Mos
	Ppt	50	-0-	-0-	N30	6-12 Mos
	Ppt	50	-0-	-0-		4-5 Mos
	Ppt-Slow 15	300000	300000	15000		1 Mo
	Ppt-Slow 30	2000000	2000000	400000		1 Mo
	Ppt-Slow 30	30000	15000	2500		1 Mo
	Ppt-Slow 30	15000	7500	100		1 Mo

	Ppt-Slow 30	10000	10000	1000		1 Mo
	Ppt-Slow 30	2500	500	500	N30	6-12 Mos
	Ppt-Slow 30	750	750	100		1 Mo
	Ppt-Slow 30	100	100	- 0 -	N30	1 Mo
	Ppt-Slow 60	1000	1000	1000		1 Mo
	Ppt-Slow 90	100000	45000	20000	1/2 10 N30	1 Mo
	Ppt-Slow 90	20000	7500	2500	N45	1 Mo
	Ppt-Slow 90	7500	2500	2500	N30	2-3 Mos
	Ppt-Slow 90+	30000	7500	7500	N45	4-5 Mos
	Slow 10	2500	750	-0-	N30	1 Mo
	Slow 10	250	-0-	- 0 -	N30	6-12 Mos
	Slow 15	2500	2500	500	N30	1 Mo
	Slow 15	500	-0-	-0-	N30	4-5 Mos
	Slow 20	50	-0-	-0-		4-5 Mos
	Slow 25	20000	1000	1000	N30	1 Mo
	Slow 30	400000	400000	300000		1 Mo
	Slow 30	5000	2500	2500		1 Mo
	Slow 30	1000	-0-	-0-		6-12 Mos
	Slow 60	25000	7500	7500	1 10 N30	1 Mo
	Slow 60	10000	-0-	- 0 -	1/2 10 N30	6-12 Mos
	Slow 30-60	1000	1000	1000		1 Mo
	Slow 60+	250	250	250		6-12 Mos
	Slow 15-80	45000	25000	15000	N30	1 Mo
	Slow 30-90	2500	1000	500	N30	1 Mo
	Slow 15-90+	100000	85000	80000		1 Mo
	Slow 120	1000	1000	1000		6-12 Mos
	Slow 30-120+	200000	200000	200000		2-3 Mos
	Slow 240	80000	40000	40000		6-12 Mos
	(067)				Sales COD	1 Mo
05/99	Ppt	250000	- O -	-0-		1 Mo
	Ppt	15000	15000	-0-		1 Mo
	Ppt	5000	5000			4-5 Mos
	Ppt-Slow 30	90000	45000	250	N30	1 Mo
	Ppt-Slow 60	600000	500000	200000		1 Mo
	Ppt-Slow 90	2500	1000	1000		1 Mo
	Slow 30	5000	5000	5000	N30	
	Slow 120	15000	7500	7500	N30	4-5 Mos
	Slow 60-120	5000	2500	2500	N30	4-5 Mos
	Slow 120	2500	2500	2500	N30	4-5 Mos
03/99	Ppt-Slow 180+	800000	600000	400000	N30	1 Mo
02/99	Ppt-Slow 90	250000	95000	40000	N30	1 Mo
07/98	Ppt	600000	600000			1 Mo
	_	xperiences	reflect	how bills	are met in	relation to the

^{*} Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

* Each experience shown represents a separate account reported by a supplier. Updated trade experiences replace those previously reported.

STATEMENT UPDATE

05/27/99 Interim Consolidated statement dated MAR 31 1999:

Cash Accts Rec Inventory Other Curr Asset	\$	14,674,000 197,671,000 211,995,000 29,386,000	Accts Pay Accruals Taxes	\$	193,769,000 42,962,000 2,358,000
Curr Assets Fixt & Equip Deferred charge:	5	453,726,000 292,011,000	Curr Liabs Other postretirement		239,089,000
& other Investments-Othe	er	7,473,000 65,057,000	benefits Deferred insurance	٠	56,798,000
			recovery		40,215,000
			L.T. Liab-Other		30,466,000
			COMMON STOCK		221,000
			ADDIT. PDIN CA	.P	129,746,000
•		•	RETAINED EARNING	S	317,697,000
			EXCESS OF NET		
			ASSETS ACQUIRED		
			OVER		4,035,000

Total Assets 818,267,000 Total 818,267,000

From JAN 01 1999 to MAR 31 1999 sales \$233,912,000; cost of goods sold \$298,263,000. Gross profit (64,351,000); operating expenses \$10,594,000. Operating income (74,945,000); other income \$58,531,000 other expenses \$2,470,000; net income before taxes (18,884,000); Federal income tax (7,192,000); (net loss) (11,692,000).

Prepared from statement(s) by Accountant: PricewaterhouseCoopers LLP.

ACCOUNTANTS OPINION: "The financial statement was reviewed by the accountant in the FFAK field.".

--0--

Accounts receivable shown net less \$51,442,000 allowance. Fixed assets shown net less \$63,233,000 depreciation.

10/01/98 On SEP 30 1998 Gary P Latendresse, v pres-cfo, deferred all information.

> Management referred to the Dec 31 1997 consolidated figures submitted on the parent as still representative.

Management previously reported 1996 sales of \$1,307,398,000.

PUBLIC FILINGS

The following data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

If it is indicated that there are defendants other than the report subject, the lawsuit may be an action to clear title to property and does not necessarily imply a claim for money against the subject.

* * * SUIT(S) * * *

CASE NO.: GC068566

PLAINTIFF: \$8,429-TRAVELERS PROPERTY STATUS: Pending

DATE STATUS ATTAINED: 04/01/1999 CASUALTY

DATE FILED: DEFENDANT: ROUGE STEEL COMPANY 04/01/1999

WHERE FILED: WAYNE COUNTY DISTRICT COURT 19, LATEST INFO RECEIVED: 06/15/1999

DEARBORN, MI

DOCKET NO.: 91-11575 NO

PLAINTIFF: IN EXCESS OF \$10,000-WINSTON STATUS: Pending

OWENS DATE STATUS ATTAINED: 05/02/1991

DEFENDANT: ROUGE STEEL CO DATE FILED: 05/02/1991

CAUSE: Personal injury - non-death LATEST INFO COLLECTED: 06/05/1991

WHERE FILED: WAYNE COUNTY CIRCUIT COURT,

DETROIT, MI

DOCKET NO.: 91-108153-cz

PLAINTIFF: IN EXCESS OF \$10,000-ALDEN LOVE STATUS: Change of venue granted

DEFENDANT: ROUGE STEEL CO DATE STATUS ATTAINED: 05/22/1991

WHERE FILED: WAYNE COUNTY CIRCUIT COURT, DATE FILED: 03/29/1991

DETROIT, MI LATEST INFO COLLECTED: 05/27/1992

COCKET NO.: 91-102638-NP

IT AMOUNT: IN EXCESS OF \$10,000 STATUS: Pending PLAINTIFF: ANTHONY & HENRIETTA AMICO DATE STATUS ATTAINED: 01/31/1991 FENDANT: ROUGE STEEL COMPANY DATE FILED: 01/31/1991 LATEST INFO COLLECTED: 03/04/1991 and OTHERS CAUSE: Product liability WHERE FILED: WAYNE COUNTY CIRCUIT COURT, DETROIT, MI DOCKET NO.: #90-026299-CE PLAINTIFF: IN EXCESS OF \$10,000-MICHIGAN, STATUS: Pending DATE STATUS ATTAINED: 10/15/1990 STATE OF DEFENDANT: ROUGE STEEL CO INC DATE FILED: 10/15/1990 WHERE FILED: WAYNE COUNTY CIRCUIT COURT, LATEST INFO COLLECTED: 11/16/1990 DETROIT, MI DOCKET NO.: #90-013610 CZ PLAINTIFF: IN EXCESS OF \$10,000-ORBIE J STATUS: Pending DATE STATUS ATTAINED: 05/30/1990 GAILES DEFENDANT: ROUGE STEEL CO DATE FILED: 05/30/1990 WHERE FILED: WAYNE COUNTY CIRCUIT COURT, LATEST INFO COLLECTED: 07/10/1990 DETROIT, MI ____ * * * UCC FILING(S) * * * COLLATERAL: All Account(s) and proceeds - All General intangibles(s) and proceeds - All Contract rights and proceeds - Equipment and proceeds FILING NO: C949811 03/22/1995 DATE FILED: LATEST INFO RECEIVED: 04/17/1995 TYPE: Original SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF STATE/UCC DIVISION, ROUGE STEEL DEBTOR: ______ COLLATERAL: Account(s) and proceeds - General intangibles(s) and proceeds -Contract rights and proceeds - Chattel paper and proceeds - Leased

Equipment and proceeds FILING NO: D434855 DATE FILED: 10/22/1998 TYPE: Original LATEST INFO RECEIVED: 12/03/1998

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

ASSIGNEE: ASSOCIATES COMMERCIAL CORP., MΙ

IRVING, TX

DEBTOR: ROUGE STEEL COMPANY INC.

COLLATERAL: Account(S) and proceeds - General intangibles(s) and proceeds -Chattel paper and proceeds - Equipment and proceeds

FILING NO: C955216 DATE FILED: 04/05/1995

PE: Original LATEST INFO RECEIVED: 05/15/1995

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

Contract rights and proceeds - Chattel paper and proceeds - Leased

DATE FILED:

DATE FILED:

03/06/1995

03/06/1995

ROUGE STEEL MΙ DEBTOR:

COLLATERAL: Account(s) and proceeds - General intangibles(s) and proceeds -

Vehicles and proceeds C943408

TYPE: Original LATEST INFO RECEIVED: 04/17/1995

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

DEBTOR: ROUGE STEEL MΙ

COLLATERAL: Account(s) and proceeds - General intangibles(s) and proceeds -

Contract rights and proceeds - Chattel paper and proceeds -

Equipment and proceeds

TYPE: Original LATEST INFO RECEIVED: 04/17/1995

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

DEBTOR: ROUGE STEEL

COLLATERAL: Equipment

C943407

FILING NO:

FILING NO:

FILING NO: D434854 DATE FILED: 10/22/1998

TYPE: Original LATEST INFO RECEIVED: 12/03/1998

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

ASSIGNEE: ASSOCIATES COMMERCIAL CORP., MI

IRVING, TX

ROUGE STEEL COMPANY INC.

COLLATERAL: Equipment

FILING NO: D434853 DATE FILED: 10/22/1998 TYPE: Original LATEST INFO RECEIVED: 12/03/1998

SEC. PARTY: CLARKLIFT OF DETROIT, INC., TROY FILED WITH: SECRETARY OF

STATE/UCC DIVISION.

ASSIGNEE: ASSOCIATES COMMERCIAL CORP.,

IRVING, TX

ROUGE STEEL COMPANY INC.

COLLATERAL: Leased Computer equipment and proceeds - Leased Equipment and

proceeds

_ LING NO: 23731B DATE FILED: 09/16/1992

TYPE: Original

C. PARTY: COMDISCO INC, ROSEMONT, IL

DEBTOR: ROUGE STEEL CO

LATEST INFO RECEIVED: 10/19/1992

FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

FILING NO: 37686B

Assignment

TYPE:

ASSIGNEE: COMDISCO, INC., ROSEMONT, IL

DEBTOR: ROUGE STEEL COMPANY

DATE FILED: 12/07/1993 LATEST INFO RECEIVED: 03/11/1994

ORIG. UCC FILED: 09/26/1993

ORIG. FILING NO: 23731B

FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

MΙ

COLLATERAL: Leased Equipment - Leased Vehicles

FILING NO: D483941

DATE FILED:

02/26/1999

TYPE:

Original

LATEST INFO RECEIVED: 03/26/1999

HEIGHTS, MI

SEC. PARTY: FORD MOTOR CREDIT CO., DEARBORN FILED WITH: SECRETARY OF

STATE/UCC DIVISION,

DEBTOR:

ROUGE STEEL COMPANY

COLLATERAL: Specified Equipment

FILING NO: C621518

DATE FILED:

07/28/1992

TYPE:

Original

LATEST INFO RECEIVED: 08/19/1992

SEC. PARTY: NATIONAL STEEL CORP, PITTSBURGH, FILED WITH: SECRETARY OF

PA

STATE/UCC DIVISION,

DEBTOR:

ROUGE STEEL CO

There are additional UCC's in D&B's file on this company available by contacting 1-800-234-3867.

The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.

HISTORY 10/01/98

CARL L VALDISERRI, CHMN & CEO+ LOUIS D CAMINO, PRES & COO+

GARY P LATENDRESSE, V PRES & CFO+ DENNIS T CROSBY, V PRES-

WILLIAM E HORNBERGER, V PRES-EMP GEORGE T KILAVOS, V PRES-PDTN

REL & PUBLIC AFFAIRS

DANIEL A MARION, V PRES-

ENGINEERING & TECHNOLOGY

PLANNING

RONALD J NOCK, V PRES-SALES &

PURCHASING & TRANSPORTATION
MICHAEL A WEISS, SEC & GENERAL
COUNSEL

DIRECTOR(S): The officers identified by (+) and Dominick C Fanello, John E Lobbia, Peter J Pestillo and Clayton P Shannon.

MKTG

BUSINESS TYPE: Corporation - DATE

Profit STA'

DATE INCORPORATED: 12/14/1981
STATE OF INCORP: Delaware

Authorized capital consists of 80,000,000 shares Class A common stock, 8,690,400 shares of Class B common stock and 8,000,000 shares of preferred stock....all with a par value of \$0.01 per share. Among other features, the holders of Class B common stock are entitled to 2.5 votes per share while Class A common holders are entitled to one vote per share.

OUTSTANDING CAPITAL STOCK AT DEC 31 1995: 13,084,965 Class A common shares at stated value \$131,000, and 8,690,400 Class B common shares at stated value \$87,000. There were no treasury shares.

Business started 1925 by the Ford Motor Company (Inc). Present control succeeded 1997. 100% of capital stock is owned by Rouge Industries Inc.

The business of the Company was first operated as a division of Ford and later as a subsidiary. On Dec 15 1989, the Company was acquired in a leveraged buyout by Marico Acquisition Corporation, owned by Carl L Valdiserri, the Company's Chairman and Chief Executive Officer, a subsidiary of Worthington Industries Inc, Chase Manhattan Capital Corporation and Ford Motor Company, for a purchase price of \$180.1 million plus \$18.8 million of transaction fees and expenses. The acquisition was financed through borrowings of \$124.9 million under a revolving bank credit facility, \$50 million under a term loan facility, \$19.0 million in subordinated debentures issued to Ford, and \$5.0 million in common stock contributed by a subsidiary of Worthington Industries Inc, Chase Manhattan Credit Corp and Carl L Valdiserri.

Ford Motor Company, Worthington Industries Inc and Chase Manhattan Capital Corporation each held an approximate 20% ownership interest in the Company following the Dec 1989 acquisition of the Company. Ford's 20% interest was redeemed by the Company on Dec 4 1992, and as outlined below, Chase Manhattan Capital Corporation sold its 2,000,000 shares of Class A common stock as part of the Company's initial public offering completed in Apr 1994.

INITIAL PUBLIC OFFERING: In Apr 1994, the Company completed an

initial public offering of its common stock, the proceeds from which approximated \$112,870,000. On Apr 6 1994, the Company fully repaid its revolving and term debt in the amount of \$49,500,000; on Apr 15 1994, repaid its \$19,000,000 subordinated debenture issue to Ford; and the balance of the net proceeds were used for general corporate purposes, including the funding of capital expenditures.

Until Jul 1997, the Company's common stok was traded on the New York Stock Exchange under the Symbol "ROU".

HOLDING COMPANY ORGANIZATIONAL STRUCTURE: In Jul 1997, a holding company organizational structure was adopted, whereby Rouge Steel Company, as operating subsidiary, became a direct wholly-owned subsidiary of Rouge Industries Inc (the Company), a newly formed holding company. In that connection, all outstanding shares of Rouge Steel Company's Class A common stock were converted into shares of Rouge Industries Inc Class A common stock, and stock certificates which previously represented Rouge Steel Company Class A common stock now represent Rouge Industries Inc Class A common stock. Rouge Industries is now the publicly traded company.

CARL L VALDISERRI born 1936. Area of responsibility is chief executive officer. 1968 was graduated by Notre Dame University. 1958-64 Wheeling-Pittsburgh Steel Corporation, Pittsburgh, PA. 1964-82 National Steel Corporation. 1982-87 Weirton Steel Company Inc, Weirton, WV; executive vice president. 1987-89 self-employed independent consultant. 1989-present Rouge Steel Company (Inc).

LOUIS D CAMINO born 1938. 1960-86 Jones & Laughlin Steel Corporation. 1986-90 Acme Steel Company; Vice President-Operations. 1989-present Rouge Steel Company (Inc); President and Chief Operating Office.

GARY P LATENDRESSE born 1944. 1968-87 Ford Motor Company (Inc), Dearborn, MI. 1987-present Rouge Steel Company (Inc); Vice President and Chief Financial Officer.

DENNIS T CROSBY born 1944. 1967-89 Inland Steel Company; general manager of engineering and environmental affairs. 1989-present Rouge Steel Company (Inc); Vice President, Engineering and Technology.

WILLIAM E HORNBERGER born 1947. 1973-81 Ford Motor Company. 1981-present Rouge Steel Company (Inc); Vice President, Employee Relations and Public Affairs.

GEORGE T KILAVOS born 1932. Has been in the steel industry since 1962. 1984-90 Weirton Steel Company; director of production planning. 1990-present Rouge Steel Company (Inc); Vice President, Production Planning.

DANIEL A MARION born 1939. 1961-1995, with Ford Motor Company; 1988-1995, Procurement Manager, Purchasing and Supply Staff. He joined the Company Mar 1 1995, Vice President-Purchasing and

Transportation.

RONALD J NOCK born 1953. In the steel industry since 1974. 1982-present Rouge Steel Company (Inc); Vice President, Sales and Marketing.

MICHAEL A WEISS born 1948. He is an attorney with Doepken, Keevican, Weiss & Medved P C, Pittsburgh, PA. 1989-present Rouge Steel Company (Inc); Secretary and General Counsel.

Chairman of Shiloh Industries Inc. JOHN E LOBBIA, director since 1990; Chairman and Chief Executive Officer at DTE Company. PETER J PESTILLO, director since 1990; Executive Vice President, Corporate Relations at Ford Motor Company. CLAYTON P SHANNON, director since 1990; retired Senior Vice President, Finance and Chief Financial Officer of Calgon Carbon Corporation.

... .. RELATED COMPANIES AND/OR SIGNIFICANT CUSTOMERS.. ...

DOUBLE EAGLE STEEL COATING (DUNS #13-143-0183), Dearborn, MI. Joint venture with United States Steel Corporation that was placed into service in 1986. Produces electrogalvanized steel. The Company owns 50% interest in joint venture, and is entitled to receive 50% of the Double Eagle's production time. The Company is also committed to pay 50% of the fixed costs incurred and a pro rata share of variable costs based on coatings applied to the Company products.

EVELETH MINES LLC, 45% owned by the Company by the Company's Eveleth Taconite Company subsidiary, and AK Steel and Stelco Inc together own 55%. Eveleth Mines owns and operates a mine and pellet producing facility. The Company is required to purchase 45% of the first 5.0 million natural gross tons of pellets produced per year by Eveleth Mines, and has the right of first refusal to 45% of any pellets produced in excess of 5.0 million natural gross tons. The Company is committed to making additional capital contributions to Eveleth Mines of \$3.4 million. Each owner, regardless of the amount of pellet production taken, is required to bear its share of the fixed costs of Eveleth Mines based upon its proportionate interest.

SPARTAN STEEL COATING LLC, joint venture formed during 1996 by the Company's QS Steel Inc subsidiary (48%) and Worthington Industries Inc, to construct and operate a cold rolled hot dipped galvanizing line. The project, which is anticipated to be complete by mid-1998, is expected to cost approximately \$90 million. The Company will be responsible for 48% of the total, or \$43.2 million.

WORTHINGTON INDUSTRIES INC (DUNS #00-431-2401), Columbus, OH. Started 1955. Processor of steel. Worthington Industries' consolidated financial statements for its fiscal year ended May 31 1997 showed tangible net worth (computed after deducting intangibles totaling \$98,132,000) \$617,386,000, and sales for fiscal 1997 of \$1,911,720,000. Worthington Industries is the second largest customer

of the Company and a 27% owner of the Rouge Industries Inc.

FORD MOTOR COMPANY (INC) (DUNS #00-134-4746), Dearborn, MI. Manufactures and assembles motor vehicles and parts. Company's consolidated financial statement for the year ended Dec 31 1996 showed total sales and revenues of \$146,991,000,000, and tangible net worth (computed after deducting intangible assets, goodwill, totaling \$5,204,000,000) \$21,558,000,000. Ford Motor Company is a significant customer of the Company. Sales to Ford, which are made pursuant to a 10-year steel purchase agreement expiring in Dec 15 1999, totaled \$397,723,000 in 1996.

The Company purchases various services including environmental, heavy equipment repair, construction, and transportation from Ford. In addition, the Company leases certain land, office space, and production support facilities from Ford under cancelable operating leases with terms ranging from 1 to 99 years.

The Company owns a 60% interest in the assets of 315-megawatt powerhouse that is managed by Ford (which owns the other 40%), under a renewable ten-year agreement expiring Jan 1 2000. The powerhouse generates electricity, steam, and other utilities. The Company and Ford each receives a portion of the power generated. The Company's share of the costs of this facility was approximately \$74,005,000 in In connection with the operation of the powerhouse, Ford purchases a portion of the gas produced by the Company's blast furnaces for use at the powerhouse under a negotiated formula. purchased from the Company \$23,300,000 worth of blast furnace gas in Of these amounts, between 60% and 70% has been charged back to the Company for its proportionate share of the cost of such gas.

SHILO OF MICHIGAN LLC, Romulus, MI, joint venture between the Company (20%) and Shiloh Industries Inc (80%), formed to produce engineered steel blanks, which the Company anticipates selling to its automotive customers. The Company's investment in the Shilo venture is \$20 million, with the remainder of the facility financed by an \$80 million investment from Shilo Industries and a \$23 million credit facility, 20% of which is quaranteed by the Company.

TWB COMPANY (DUNS #78-915-3079), Monroe, MI. Producer of laser welded blanks sold primarily for automotive applications. Joint venture between Worthington Industries, Thyssen Steel, the Company (11% interest acquired in Apr 1997), Bethlehem Steel, LTV Steel and Rouge Steel.

OPERATION

- 1/01/98 Subsidiary of Rouge Industries Inc, Dearborn, MI started 1989 which operates as holding company. Parent company owns 100% of

REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH PCB REGULATIONS

ROUGE STEEL 3001 MILLER ROAD DEARBORN, MICHIGAN 48121-1699

AUGUST 25, 26, 27, 28, 1998

PERFORMED BY:

KENDALL MOORE JOANA BEZERRA MARK MOLONEY

U.S. ENVIRONMENTAL PROTECTION AGENCY PESTICIDES AND TOXICS BRANCH 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604-3590

PCB COMPLIANCE INSPECTION REPORT

I. OBJECTIVES

The inspection was conducted as part of a multimedia inspection to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 C.F.R. Part 761, as published in the <u>Federal Register</u> of May/31, 1979, and as amended.

II. COMPANY IDENTIFICATION

Rouge Steel Company
3001 Miller Road
Dearborn, Michigan 48121-1699

RESPONSIBLE OFFICIAL

Donald S. Windeler, P.E.

III. DATE OF INSPECTION

August 25, 26, 27, 28, 1998.

IV. PARTICIPANTS

Company

Donald S. Windeler, P.E, Manager, Environmental Engineering Department Lowell T. Potvin, Environmental Engineer

James E. Earl, Environmental Engineer

John R. Olasz, Central Maintenance CAMS Electrical

U.S. EPA

Kendall Moore, Environmental Scientist

Mark Moloney, P.E., Environmental Engineer

Joana Bezerra, Environmental Engineer

V. COMPANY BACKGROUND PCBs No PCBs

Rouge Steel Company traces its roots to 1919 and the earliest days of America's automobile industry. It is located in the historic Ford Motor Company Rouge Complex, just west of Detroit on the Banks of the Rouge River, on a 550 acres site. Rouge Steel was purchased from Ford in 1989 by a consortium led by Carl Valdiserri, now chairman and chief executive officer. He actively enlisted the support of the employees and the United Auto Workers and in 1994 the company went public. In 1997 Rouge Steel was

restructured into a holding company organization. Rouge Industries became the parent holding company of Rouge Steel and several joint ventures. Rouge Industries stock trades in the New York Stock Exchange.

Major steel making operations include: raw material handling facility; three blast furnaces (two operating); Basic Oxygen Furnace (BOF) and electric furnace steel making with a total annual rated capacity of 3.2 million tons; ladle metallurgy station; continuous slab caster; slabbing mill; three continuous pickle lines; tandem cold reduction mill; batch and hydrogen annealing facilities; temper mill and electrogalvanizing line. Presently Rouge Steel has 3,100 employees and 1997 annual sales of \$1,341,641,000.

Rouge Steel is the seventh largest integrated steel mill in the United States.

VI. INSPECTION SUMMARY

Opening Conference

- A. The inspectors met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:
 - 1. Notice of Inspection
 - 2. TSCA Confidentiality Notice
 - 3. Receipt for Samples/Documents collected

These documents are included as Attachments, and were signed by Don Windeler.

B. Circumstances Applicable to this Inspection

Disposal Use/Authorizations

Marking

Record keeping

Storage / Manufacturing

Distribution Incoming Materials

None of the Above Other

C. CITATION

None Issued

D. CLOSING CONFERENCE

The inspector explained the three possible outcomes of the inspection and informed the company official that a final determination and notification would be made by the Regional Office.

VII. ATTACHMENTS

- A. Notice of Inspection
- B. TSCA Inspection Confidentiality Notice
- C. Receipt for Samples and Documents

- D. Photographs
- E. List of transformers
- F. Sample Results
- G. Rouge Steel Company Annual Summary Document 01/1,1997 to 12/31/97
- H. PCB Quarterly Inspection Report
- I. 1997 Annual Report
- J. Copy of Chain of Custody Record sheet.

VIII. INSPECTOR'S COMMENTS

Disposal, Use/Authorizations, Storage, Marking and Record keeping

Electrical Equipment

Rouge Steel owns and operates 167 transformers, 88 of them are PCB transformers. The inspectors were provided with a list of the 88 PCB transformers. Of this list of 88 PCB transformers, 4 had been removed and 2 were sent to Ford, which has a plant on the same campus. All the remaining 82 PCB transformers were inspected by Kendall Moore, Joana Bezerra and Mark Moloney. The inspectors were escorted at all times by two people from Rouge Steel. One of them was John Olasz, of Central Maintenance, who has worked at the plant for more that 35 years. He was assisted by either James E. Earl or Lowell Potkin, who are both environmental engineers.

We were told that all other electrical equipment at the facility was non-PCB. The inspectors used the list of original 88 PCB transformers as a check list during the walk through part of the inspection. This list can be found on <u>Attachment E</u>.

On August 25, during the first day of the walk through part of the inspection, 6 transformers were inspected, and two samples were taken. On the second day 6 samples and on the third day 4 additional samples were taken.

The following table describes the samples taken at the respective transformers together with laboratory test results.

Transformer Identification	Sample Type and Date	Sample Results	Comments
1D1	Wipe	$6.8 \mu\text{g}/100 \text{cm}^2$ Aroclor	Accessway to transformer
	8/25/98	1260	not labeled. No stain
1D6	Soil	25 μg/gm Aroclor 1260	Accessway not labeled.
	8/25/98		
24T1	Wipe	241.2 μg/100 cm ² Aroclor	Pyranol Nameplate.Whole
	8/26/98	1260 and 100 μ g/100cm ²	area stained. Photo #1
		Aroclor 1262 503	
24T2	Wipe	214.9 μ g/100 cm ² Aroclor	Pyronol Nameplate. 75% of
	8/26/98	1260 and 50 μ g/100 cm ²	area stained.Photo # 2
		Aroclor 1262 Soy	
21G2	Wipe	$22.7 \mu g/100 \text{ cm}^2 \text{Aroclor}$	No visible stains.
	8/26/98	1260 S05	
12M	Soil	663 μg/gm Aroclor 1260	
	8/26/98	504	
44H1	Soil	10.5 μg/gm Aroclor 1254	
	8/26/98		
44G2	Soil	76 μg/gm Aroclor 1254	
	8/26/98	508	
4A3	Wipe	$1508 \mu g/100 \text{ cm}^2 \text{ Aroclor}$	Totally enclosed. Sample taken
	8/27/98	1260 and 200 μ g/100 cm ²	with a flashlight.
		Aroc. 1262 50 ⁶ \	
Storage Area	Wipe	250,000 μg/100 cm ² Aroclor	Storage area belongs to
Drum Sample	8/27/98	1260 and 20,000 μg/100	Ford.
		cm ² Aroclor 1262	

Transformer	Sample Type and	Sample Results	Comments
Identification	Date		
41.4	Wipe 8/27/98	529.3 μg/100 cm ² Aroclor 1260 and 100 μg/100 cm ² Aroclor 1262	Stains randomly distributed around transformer.
Westinghouse # 1218797	Soil 8/27/98	4.76 μg/gm Aroclor 1260	

Transformer 1D1, was located in an outdoor substation that was enclosed by a chain link fence. The transformer was marked with a $M_{\scriptscriptstyle L}$ label, but the accessway to the transformer did not have a M_L label. The company corrected the problem immediately by posting a M_L label on the fence. There was no stain on the ground but a wipe sample was taken on the concrete pad that supported the transformer and the PCB levels in the sample came back with undetected PCB levels. (See attachment F). Also sampled on this day was transformer 1D6, which, like transformer 1D1, was located in an outdoor substation with a chain link fence enclosure. The accessway to the transformer was not labeled but the transformer had an $M_{\scriptscriptstyle L}$ label, and it was visible from the outside of the chain link fence. There was evidence of staining on the soil which had accumulated around the transformer. Mr Olasz indicated that he believed that this transformer was a PCB contaminated transformer that had originally contained 62 ppm but had been drained. According to Mr. Olasz ,the oil had been drained from the transformer and placed in the five 55-gallon drums that were stored for disposal outside the transformer's containment, inside the chain link fence. Mr. Olazs said he did not know when the drums were placed there but he believed it was longer than 30 days. Mr. Olazs said that the drums were to be picked up very soon and the paper work was in order and it was being taken care of by Charles Johnson, an environmental engineer who was on sick leave during the inspection. The drums had ML labels, but were not marked with the date first placed in

storage. A composite sample was taken from the soil that had accumulated on the concrete pad by the transformer and around the drums. The soil sample came up with 25 ppm PCB. (See Attachment F).

On August, 26, 47 PCB transformers were inspected and six samples were collected. Combustible material including wood and paper as well as cans of solvents were found less than 5 meters away from transformer 12L6. (Photographs #5 and 6). Mr. Olasz ordered the immediate removal of the cans and material. The first two samples taken were wipe samples from the concrete pads that supported transformers 24T1, and 24T2 in the Rolling mill, both transformers had Pyranol (a PCB brand) nameplates. Transformer 24T1 had stains throughout the entire containment area. Transformer 24T2 had stains on about 75% of the containment area (photographs #1 and 2) The result of the 24T1 sampling showed 241.2 μ g/100 square centimeters of Aroclor 1260 and 100 μ g/100 square centimeters of Aroclor 1262. For the 24T2 the results were 214.9 μ g/100 square centimeters of Aroclor 1260 and 50 μ g/100 square centimeters of Aroclor 1262. A wipe sample from the containment area of transformer 21G2 on Road 4 in the Mill Plant came back as 22.7 μ G Aroclor 1260/100 square centimeters. This transformer was in a series of 3 transformers on a red cement floor that did not have visible signs of staining. A soil sample from accumulated dirt in the containment area of transformer 12M (Photograph # 4) in the Rolling mill resulted in 663 ppm PCB. The soil had accumulated around the transformer probably brought by stormwater. Two more soil samples at transformers 44H1 and 44G2 in the Hot Strip Mill (Photographs 8 and 9) were taken and showed 10.5 and 76 μ g/gm respectively. Other transformers inspected on the 26 th of August were 12Q, 24C1 and 12F, all with Pyranol nameplates, and M_L labels. The accessways to 12Q and 24C1 did not have $M_{\scriptscriptstyle L}$ labels. All the other transformers inspected on the August 26 did not appear to be leaking and had the proper marking.

On Thursday August 27, the remaining transformers were inspected and four more samples were collected. One of the samples was a wipe sample taken at transformer 4A3 at Rouge Operations Warehouse -ROW- (Photograph # 10). This transformer was housed in a lower level hard to access. A flash light was used to take a wipe sample. The concrete floor had random stains. The results were 1508 μ g/100 cm² of Aroclor 1260 and 200 μ g/100 cm²

Aroclor 1262. In this same building which is owned by Rouge Steel there is a PCB storage area that was diked, labeled with M_L label and enclosed with chain link fencing. Several items were stocked for disposal and reuse. One 55-gallon drum containing a small amount of oil had an M_L label but did not have the date which it was placed in storage. A wipe sample was taken of oil on top of the drum since it was too difficult to sample what appeared to be a quart of oil in the drum. The lab result came as 250,000 μ g/100 square centimeters of Aroclor 1260/. (Photograph # 14). There were debris around the drum with no date on but the door to the storage area had an M_L label. We were told that this storage area, at the time of the inspection, was managed by Ford Motor Company. The last two samples were taken at transformer 4L4, a wipe sample at the ROW and a soil sample collected around a Westinghouse transformer serial number 1218797 (Photograph # 18). The lab results for transformer 4L4 were 529.3 μ g/100 square centimeters of Aroclor 1260 and 100 μ g/100 square centimeters of Aroclor 1260.

The following transformers either did not have a label or the label was faded in such a way it could not be read or the access to them was not labeled: 1MG, 2MG, 12L6, 12Q, 1D2, 1D5, 24A4, 24C1, 24C2, 24S1, 24S2, 27C1. Company personnel were carrying a stack of labels and sticking them on transformers and doors as needed.

Storage

Rouge Steel stated that they did not maintain a PCB waste storage. The storage area we observed on their property and from which we took a wipe sample of a drum's top, belonged to Ford, they told us. This storage area did have a roof and was diked. The drum from which we took a sample did not have a date of storage.

Hydraulic and Heat Transfer Systems

The facility does not utilize any heat transfer systems.

Waste Oil

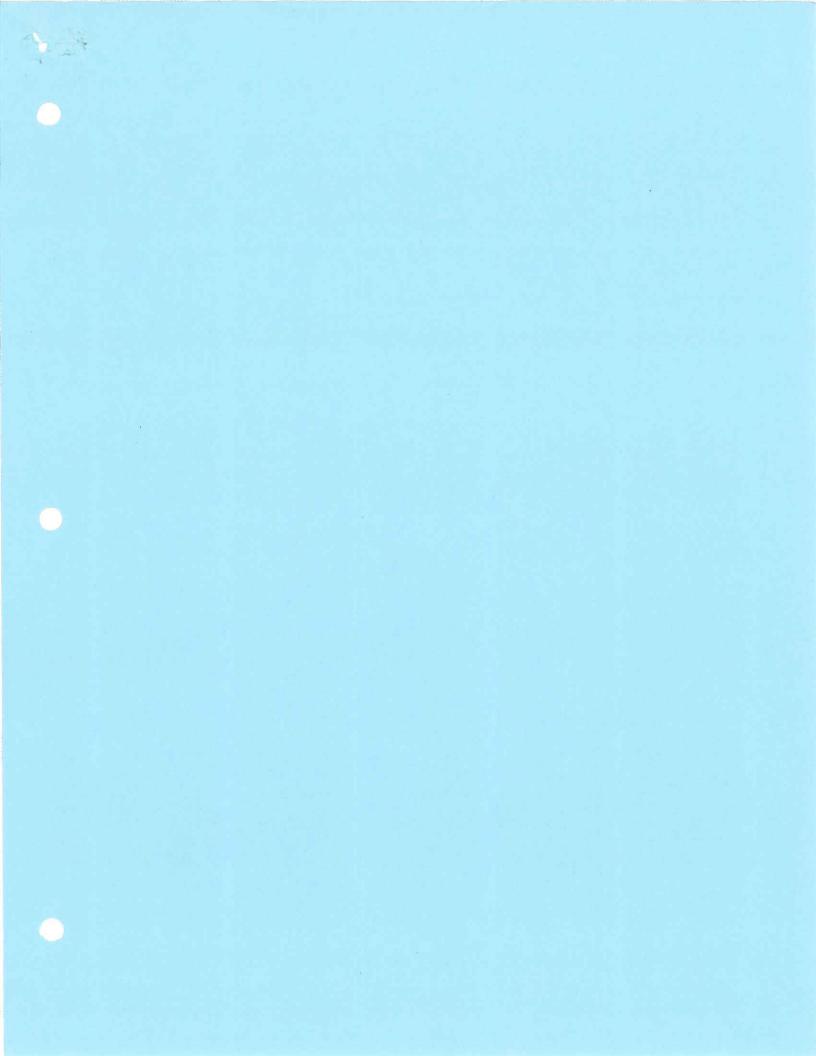
Rouge Steel generates approximately 20,000 gallons of waste lubricating oil per month. This waste is recycled by Oil Technology and sold to steel mills for fuel recovery.

Record Keeping

The facility's annual records were observed for the years 1997 and were found to be in order. Also quarterly inspection records were reviewed and found to be in order. The Ford plant in the same campus has its own Fire Department and handles the fire notification for Rouge Steel.

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Date:	
Date.	

Joana D. Bezerra, Environmental Engineer Pesticides and Toxics Enforcement Section United States Environmental Protection Agency



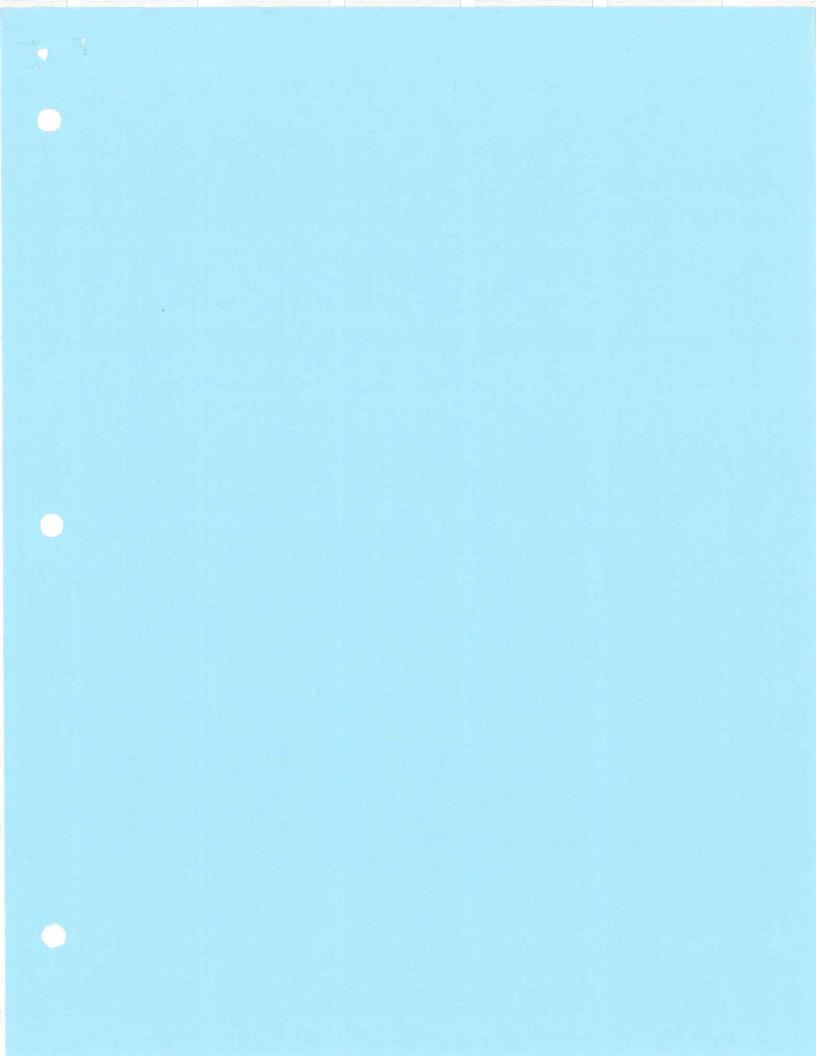


US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

	TOAIC SUBSTANCES	ישרון וושע רעין	:
	NOTICE OF IN	SPECTION	
1. INVESTIGATION IDENTIFICA	TION	3. FACILITY NAME	
DATE INSPECTION NO.	DAILY SEQ. NO.	0 -11	
B-25-98 16886	0/	Nouge Steel	·
2. INSPECTOR'S ADDRESS		4. FACILITY ADDRESS	A
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Under the authority of Section 11 of the Toxic S	Substances Control Act:	•	
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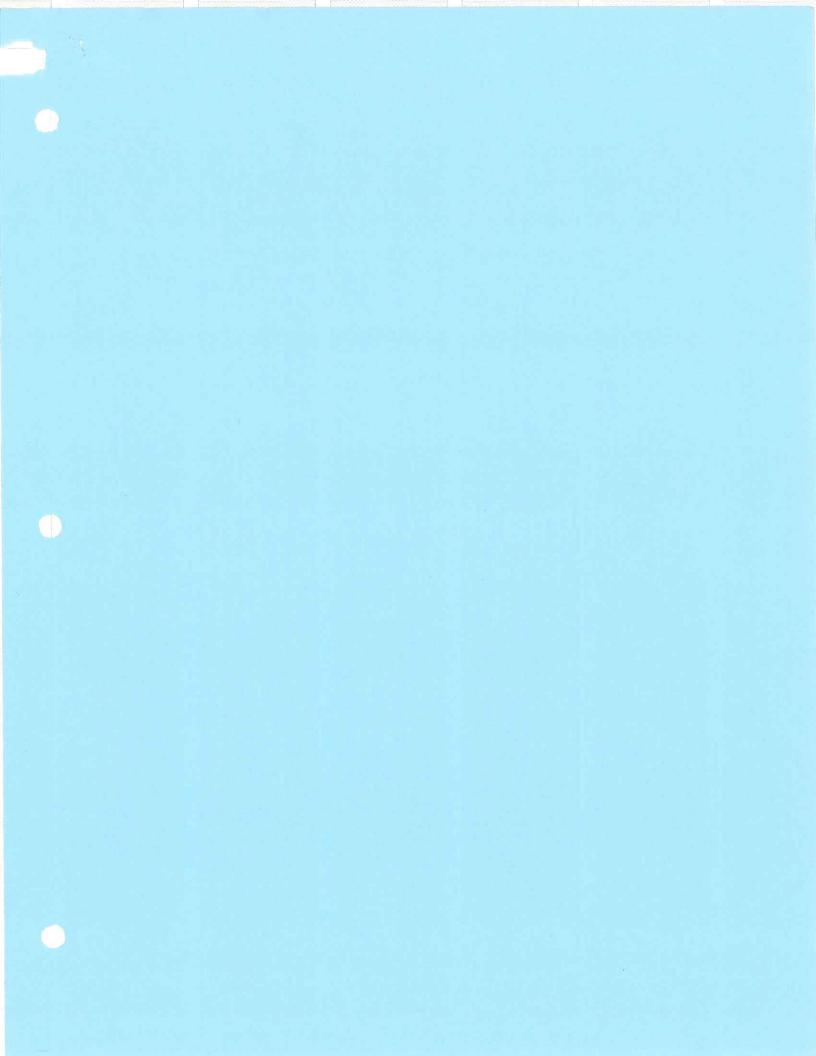
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US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 TOXIC SUBSTANCES CONTROL ACT

EPA TSCA INSPE	ECTION CONFIDENTIALITY NOTICE
1. INVESTIGATION IDENTIFICATION	4. FACILITY NAME
DATE INSPECTION NO. DAILY SEQ. NO. 0/	Rouge Steel
2. INSPECTOR'S NAME Kench // Moore	5. ADDRESO 3001 Miller Road Dearborn, Mi 48121
3. INSPECTOR'S ADDRESS 45 EPA 77 W. Jackson Blvd. Chicago, Il. 60604	6. NAME OF CHIEF EXECUTIVE OFFICER 7. TITLE
For internal EPA use. Copies may be provided to recipient as acknowledgm	ent of this notice.
TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM	
It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA. — all information collected by EPA during the inspection may be claimed as initial if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI. A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures. While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria: 1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.	 The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding). The information is not publicly available elsewhere. Disclosure of the information would cause substantial harm to your company's competitive position. At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBL. If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment. The statement from the Chief Executive Officer should be addressed to: The statement from the Chief Executive Officer should be addressed to: The claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.
TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE I acknowledge receipt of this notice:	If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.
SIGNATURE S.S. Windeler	NAME
NAME D. S. WINDEZER EMANAGER, ENVIRONMENTAL ENGINEERING 8/25/98	TITLE
ENVIRONMENTAL ENGINEERING 8/25/98	ADDRESS
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United States Environmental Protection Agency Washington, D.C. 20460

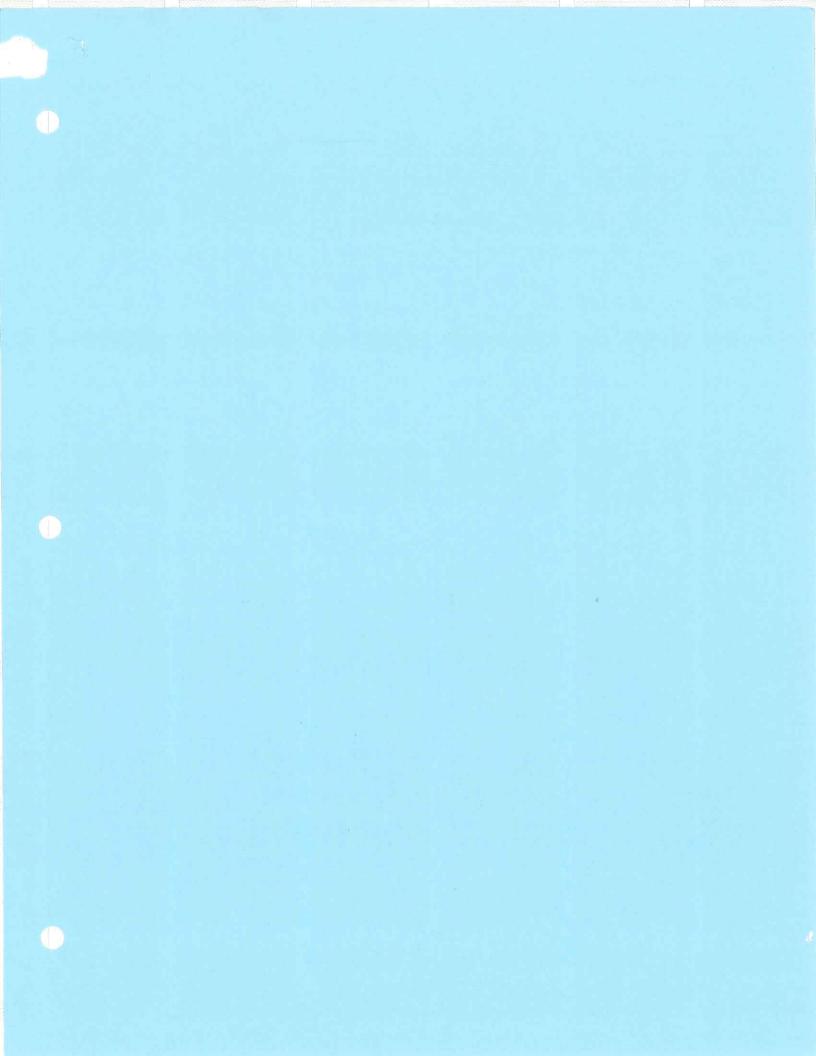
Toxic Substances Control Act

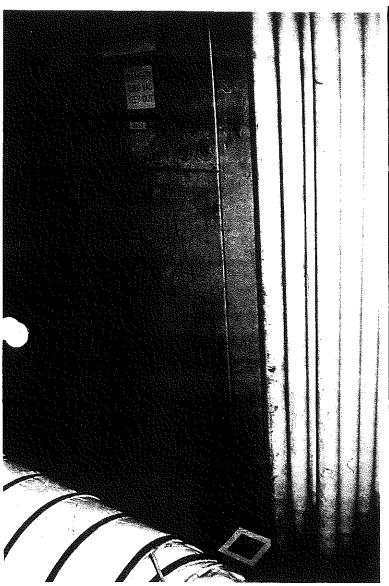
Form Approved OMB No. 2070-0007 Approval Expires 10-31-92

RECEIPT FOR SAMPLES AND DOCUMENTS

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

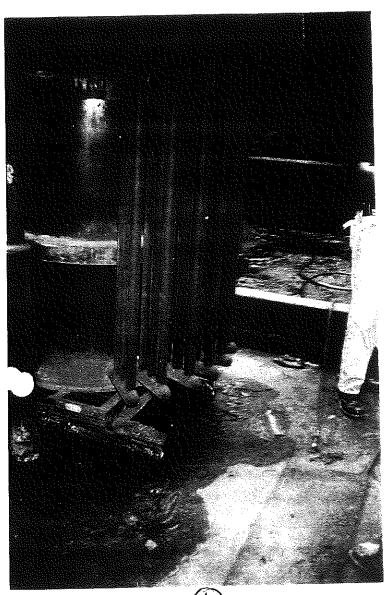
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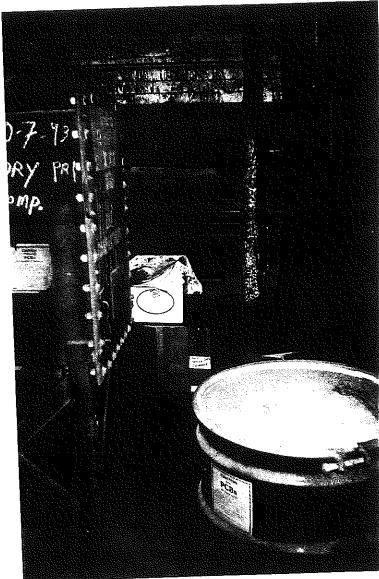






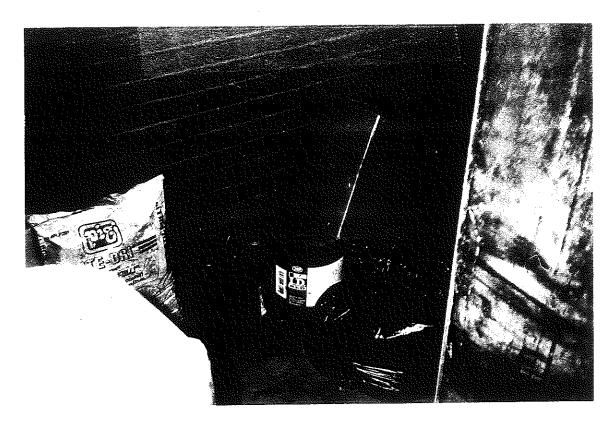
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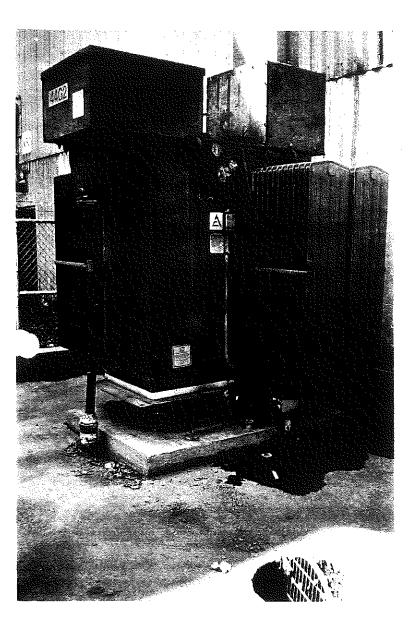
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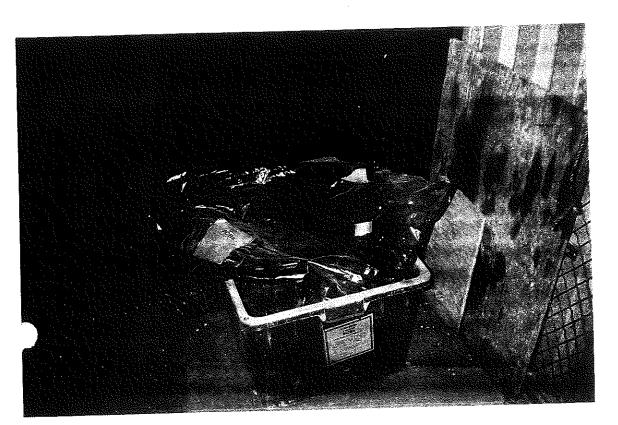




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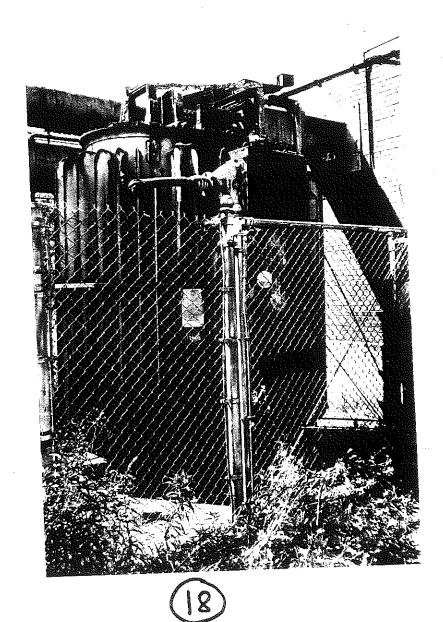
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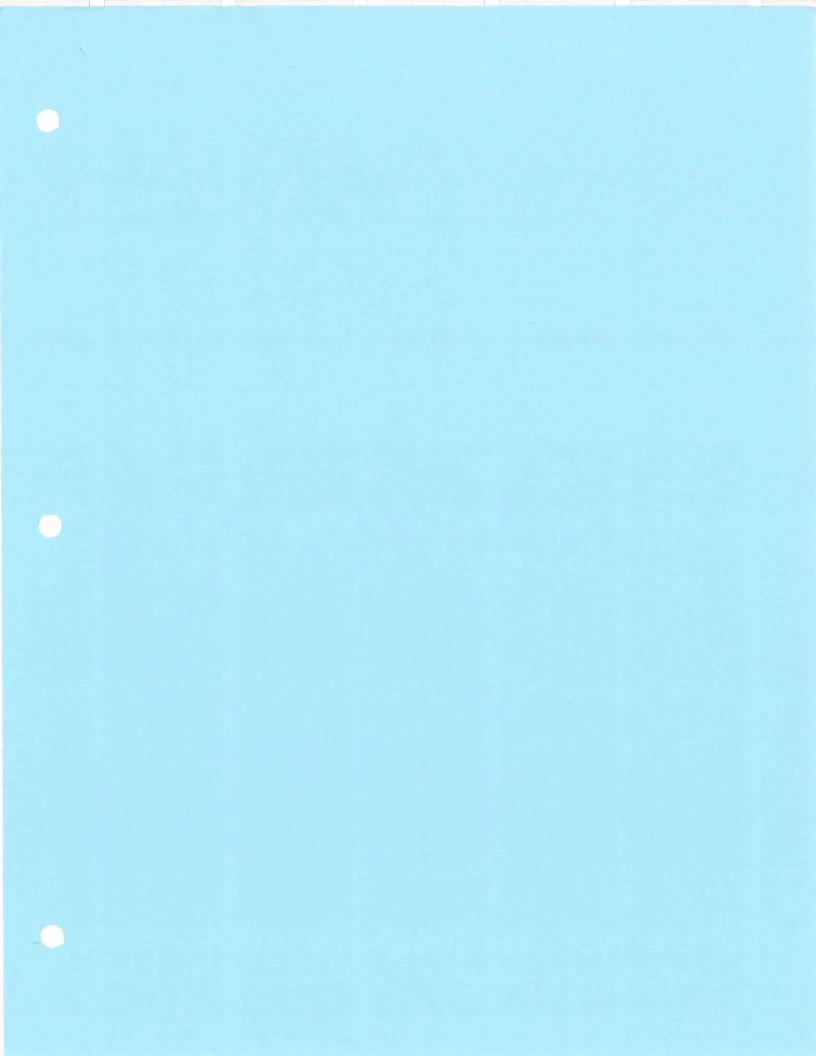




(4) Sample 510



Soil Sample 512



Rouge Steel Quarterly PCB Transformer Inspection Qtr 1 Yr 1997

	Item		User	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
	No.	Турс	Location	min/lev/max	vac/press	s C	(dirty/leaking)	(if visible)	Condition	If yes, where?	Kemaiks
/	#1 MG	React	Sub 3, Basement	25C	0	30	Good	Not Visible	Good	None	
	#2 MG	React	Sub 3, Basement	25C	0	30	Good	Not Visible	Good	None	
	#5	React	Roll Mill, Sub12B,J44		No Press. Gage	30	Dirty	Not Visible	Good	None	
	F2F	Transf	Roll Mill. J36 BALC	25C	j »	40	Good	Not Visible	Good	None	
1	12L5	Transf	Roll Mill, Sub 12A		No Press. Gage	20	Good	Not Visible	Good	None	
	2L6	Transf	Rolling Mill, J9	1	No Press Gage	30	Good	Not Visible	Good	Yes, active PCB fluid present on one radiator	Requires Attention
2004	2L7	Transf	Rolling Mill, Sub 12B		No Press. Gage	30	Good	Not Visible	ا سا	Hydraulic oil and water in containment	
-	2L8	Transf	Roll Mill, J60 BALC]	No Press. Gage	50	Good	Not Visible		Yes, drain valve weeping at threaded connection	
J	2L9	Transf	Roll Mill. G54 BALC	1	No Press. Gage	20	Dirty	Not Visible	Good	None	
/	2M	Transf	Rolling Mill YZ 45	1	Gage broken	40	Good	Not Visible	Good	None	
1	2Q	Transf	Roll Mill: #2 Tandem	25C		No Temp Gage	Good	Not Visible	Good	1	Excessive combustibles

Rouge Steel Quarterly PCB 7 former Inspection Qtr 1 Yr 1>>/

		User	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
item No.	Туре		min/lev/max	vac/press	C	(dirty/leaking)	(if visible)	Condition	If yes, where?	
1D1	Transf	Hiline Road	25C	0	25	Good	Not Visible	Good, except as noted	Yes, carmalized PCB around top standpipe	
1D1	Transf	Hiline Road 4 Area	25C	0	20	Good	Not Visible	Good	None	Excessive noise levels
1D3	Transf	Hiline	<25C_	0	20	Good	Not Visible	Good	None	>
1D4	Transf	Hiline	<25C	1#	26	Good	Not Visible	Good	None	
1D5	Transf	Hiline south	<25C	0	30	Good	Not Visible	Good	None ~	Epoxy repair on standpipe
/ 21 G 1	Transf	S. Side Road 4, J15	30C	No Press. Gage	45	Good	Not Visible	Good	None	
21 G 2	Transf	S. Side Road 4, J15	50C	No Press. Gage	45 9	Good	Not Visible	Good	None	
21 GL 9	Transf	S. Side Road 4, J15	25C	No Press. Gage	40	Dirty	Not Visible	Good	None	and the contract of the contra
24 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Transf	Rolling Mill	1	0	40	Good	Not Visible	Good	None	Drain valve
24C1	Transf	Rolling Mill	25C	0	28	Dirty	Not Visible	Good	None	Orain valve
24C2	Transf	Rolling Mil	1	0	25	Good	Not Visible	Good, except as noted	Yes, weeping around standpipe cap	

Rouge Steel Quarterly PCB 7 Insformer Inspection Qtr 1 Y1 1

Item		User	Level	Pressure	Temperature		Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
No_	Туре	Location	min/lev/max	vac/press	. C	(dirty/leaking)	(if visible)	Condition	If yes, where?	<u> </u>
Λ		Rolling Mill,					tem to 160 P.	HELEN GOLDENSON	Tendo de la companya	STORY OF A STATE OF A
2481	Transf	A42	Note 1	Note 1	Note I	Good	Not Visible	Good	None	-
/		Rolling Mill.				i				
2452	Transf	A42	Note I	Note I	Note I	Good	Not Visible	Good	None	
Λ		Roll Mill #2						Good, except as	Front side sample plug	
24T1	Transf	Tandem	25C	1"	80F	Good	Not Visible	noted	epoxied and weeping	
		Roll Mill #2								Oil and dirt
24T2	Transf	Tandem	25C	1.5#	40	Dirty	Not Visible	Good	None	coating unit
		BOF WSide				Coated with			-	PCB contamin-
27A1	Transf	Baghouse	<25C	0	40	precip. residue	Not Visible	Good	None	ated dike
		BOF WSide						- CONSTRUCTOR		PCB contami/-
127A2	Transf	Baghouse	Removed	Removed	Removed	Removed	Removed	Removed	Removed	ated dike
1		BOF WSide				Coated with			,	the control of the co
2 <mark>7B1</mark>	Transf	Baghouse	Low	0	25	precip. residue	Not Visible	Good	None	
V		BOF WSide			ř	Coated with		* *		
27B2	Transf	Baghouse	Low	0	25	precip. residue	Not Visible	Good	None	
		BOF. D23.						-		Area extremely
√27C1	Transf	Service FL	25C	1.5#	45	Good	Not Visible	Good	None	dirty
1		BOF, D23.						,		
√2,7C2	Transf	Service FL	25C	2" -	45	Good	Not Visible	Good		
1.		BOF Motor					,		Yes, PCB residue at	THE PARTY OF THE P
/ _{27D} ,	Transf	Room	25C	1"	35	Good	Not Visible	Good	base of standpipe	<u></u>

Note 1: Not inspected due to water.

Rouge Steel Quarterly PC ransformer Inspection Qtr 1 Yr 1997

item		Uscr	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
No.	Туре	Location	min/lev/max	vac/press	C	(dirty/leaking)	(if visible)	Condition	If yes, where?	
30C1	Transf	B Road, Near Road 4	25C	0	30	Good	Not Visible	Good	None	
30C2	Transf	B Road, Near Road 4	25C	0	30	Good	Not Visible	Good	None	
43D1	Transf	Slab Mill, Motor Room	25C	0	10	Good	Not Visible	Could not inspect bottom	None	Valve under water
43D2	Transf	Slab Mill, Motor Room	25C	17	10	Good	Not Visible	Could not inspect bottom	None	Valve under water
43D3	Transf	Slab Mill, Motor Room	Low	1/2#	5	Good	Not Visible	Could not inspect bottom	None	Valve under water
43D4	Transf	Slab Mill, Motor Room	25C	1"	5	Good	Not Visible	Poor, tank bottom rusted	None	Tank seve ^{-1.} rusted
43E1	Transf	Slab Mill, Motor Room	<10C	2"	10	Good	Not Visible	Could not inspect bottom	None	Valve under water
43E2	Transf	Slab Mill, Motor Room	<10C	0	20	Good	Not Visible	Could not inspect bottom	None	Valve under water
43F1	Transf	Slab Mill. Motor Room	25C	1/4"	12	Good	Not Visible	Good, except as noted	None	Damaged radiator fin
43G2	Transf	Slab Mill, Motor Room	10C	0	10	Good	Not Visible	Good	None	
/ 431 ₁ 2	Transf	Slab Mill, E of Office	Note I	Note I	Note I	Good	Not Visible	Good	None	

Item		User	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
No.	Type	Location	min/lev/max	vac/press	, C	(dirty/leaking)	(if visible)	Condition	If yes, where?	
		Slab Mill,								mananani/W
431	Transf	Motor Room	<min< td=""><td>0</td><td>5C</td><td>Good</td><td>Not Visible</td><td>Good</td><td>None</td><td>Droken</td></min<>	0	5C	Good	Not Visible	Good	None	Droken
		Hot Strip			`			Good, except as	Yes, behind drain valve	pressure :
44BI	Transf	Mill, K26	25C	4#	55	Good	Not Visible	noted	on pad	nag :
		Hot Strip								- Andrews Station
V4451	Transf	Mill, L43	28C	1/4#	45	Good	Not Visible	Good	None	
		Hot Strip								Constitution of the Consti
44C2	Transf	Mill, L43	28C	17	45	Good	Not Visible	Good	None	No.
		Hot Strip								
V44C3	Transf	Mill, L43	28C	1/4#	45	Good	Not Visible	Good	None	AGREEM
		Hot Strip	<u> </u>					r		1
44C4	Transf	Mill, L43	28C	1.5"	45	Good	Not Visible	Good	None	
		Hot Strip							1	ICDOXY ON
44DI	Transf	Mill, L43	25C	1/2"	25	Good	Not Visible	Good	None	sample valve
		Hot Strip								ALL AND
44D2	Transf	Mill, K22	25C	1#	22	Good	Not Visible	Good	None	PEJAGUITA .
		Hot Strip						Good, except as		Temps
44EI	Transf	Mill, K28	15C	0	20	Good	Not Visible	noted	None	weeping
	1101131		150		<u>_</u> ,					
44E2	Transf	Hot Strip Mill, K28	20C	1/2#	20	Good	Not Visible	Good	Nose	
		Hot Strip		· · · · · · · · · · · · · · · · · · ·				Good, except as	,	Pressure relicf
V _{14F} J	Transf	Mill, K47	<10C	2"	18	Good	Not Visible	noted	None	rusted away

Rouge Steel Quarterly PCB Assormer Inspection Qtr 1 Yr 1997

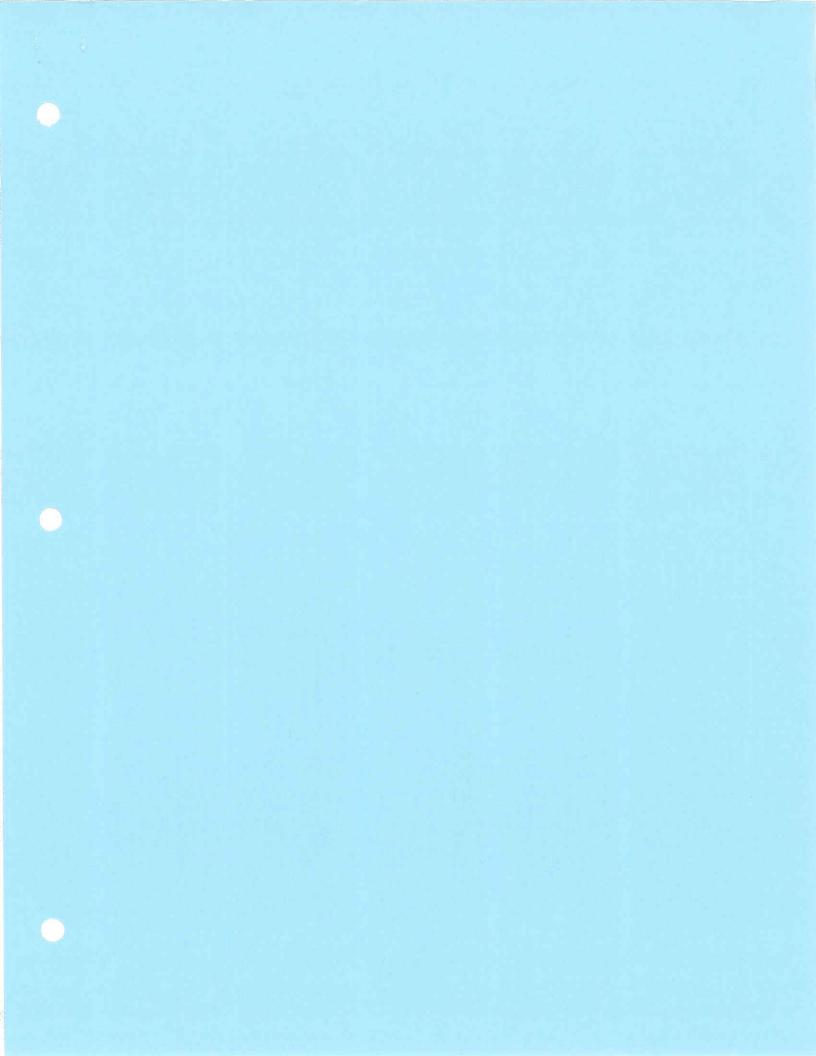
Item		Usor	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
No.	Туре	Location	min/lev/max	vac/press	<u> </u>	(dirty/leaking)	(if visible)	Condition	If yes, where?	
/		Hot Strip						Tables of		Ероху оп
44F2	Transf	Mill, K47	<10C_	1#	20	Good	Not Visible	Good	None	sample valve
¥		Hot Strip						or manufacture and the second and th	THE PROPERTY OF THE PROPERTY O	Control
44G1	Transf	Mill, K59	10C	0	18	Good	Not Visible	Good	None	·
		Hot Strip	200	_		 C3 4	% ₹ _ ^ % ₽° _ ° & R _		6	Welded hand-
44G2	Transf	Mill, K59	20C	0	10	Good	Not Visible	Good	None	hole w/primer
1		Hot Strip						Good, except as	-	Tank ground
44111	Transf	Mill, H73	10C	0	20	Good	Not Visible	noted	None ·	rusted away
1		Hot Strip							and the second s	
44H2	Transf	Mill, H73	20C	0	20	Good	Not Visible	Good	None	ļ_ ^
		Elect Furn,		No. Press					Approximation of the second of	postopmer is
45C1	Transf	Maint Shop	25C	Gage	5	Good	Not Visible	Good	<u></u>	macine
¥ .		Elect Furn,		No. Press					-	Fraggiormer is
45C2	Transf	Maint Shop	22C	Gage	5	Good	Not Visible	Good	None	inactive
		Elect Furn,			7,5	I I			-	
45D1	Transf	Maint Shop	Hi	2"	30	Good	Not Visible	G 1	None	
/		Elect Furn.						SO CANADA DE LA CANADA DEL CANADA DE LA CANADA DEL CANADA DE LA CANADA DELA CANADA DELA CANADA DELA CANADA DE LA CANADA DELA C	• • • • • • • • • • • • • • • • • • •	
45D2	Transf	Maint Shop	Hi	977	25	Good	Not Visible	Good	None	
		Elect Furn,								- Carron
45EF	Transf	Maint Shop	25C	0	45	Good	Not Visible	Good	Mone	
		Elect Furn,					170000	The state of the s		
45E2	Transf	Maint Shop	25C	1/2#	45	Good	Not Visible	Good	None	

Rouge Steel Quarterly PCB Fransformer Inspection Qtr 1 Yr 1997

	 -		~ · · · · ·			-				
Item	'	User	Level	Pressure	•	Fin Condition	Bushing Condition	Tank and Fitting	Indications of staining?	Remarks
No.	Туре	Location	min/lev/max	vac/press	C	(dirty/leaking)	(if visible)	Condition	If yes, where?	
		Coke, WW			1					TAXABARIN TAXABA
√46A1	Transf	Bldg East	25C	0	40	Good	Not Visible	Good	None	Samue A Production
		Coke, WW								POSPH Paking
46A2	Transf	Bldg East	25C	0 7	40	Good	Not visible	Good	None	- South and the second
		Coke, WW	7			1	2		Yes, side of tank, pos-	Panehine or pol-
\checkmark _{46B2}	, 'Transf	Bldg East	25C	1/2#	50	Good	Not-Visible	Good	sibly potting compound	ting cmp. leak
		ROW B28		No Press.				Small weep on		Epoxy on
√ 4A3	Transf	Basement	1	Gage	25C	Good	Not Visible		None ·	sample valve
	 · · · 	ROW B12						Top flange epoxy		PCB odor in
4B4	Transf	Basement	25C	0	60	Good	Not Visible	" " " "	None	room
/		ROW F28		No Press.				•		A DATE OF THE PARTY OF THE PART
4LI	Transf	Basement	ř	Gage	35	Good	Not Visible	Good	None	regional de la constant de la consta
		ROW G20	 -	No Press.	· · · · · · · · · · · · · · · · · · ·					and the same of th
V _{4L2}	Transf	Basement	4	Gage	35	Good	Not Visible	Good	None	the documentations
,	-	ROW F13	1	No Press.				Tank valves		- Invade
7 _{4L3}	Transf	Basement	1	Gage	30	Good	Not Visible	ì	None	
		ROW F5	1	No Press.						VIII-
V _{4L4}	Transf	Basement		Gage	40	Good	Not Visible	Good	Note	S. C. PERSON PROPERTY OF THE P
1	134113	1					<u> </u>		, and the same of	A CONTRACTOR OF THE CONTRACTOR
FMI	Transf	Hot Mill. East Side	25C	2#	35	Good	Not Visible	Good	None	The state of
	1 1 1 1 1 1 1	†						·	-	Citabilitation
V FM4	Trance	1	250	2#	30	Good	 Not Visible	Good	None	en al company de la company de
FM4	Transf_	Hot Mill, East Side	25C	2#	30	Good	Not Visible	Good	None	<u></u>

Rouge Steel Quarterly PCB isformer Inspection Qtr 1 Yr ... 17

Item		User	Level	Pressure	Temperature	Fin Condition	Bushing Condition	Tenk and Fitting	Indications of staining?	Remarks
No.	Туре	Location	min/lev/max	vac/press	C	(dirty/leaking)	(if visible)	Condition	If yes, where?	
FM5	Transf	Hot Mill, East Side	25C	0	30	Good	Not Visible	Good	None	
FM6	Transf	Hot Mill, East Side	25C	2#	40	Good	Not Visible	Good	None	edistrimination and discountry
PM7	Transf	Hot Mill, East Side	25C	2#	40	Good	Not Visible	Good	None	-
[∞] M0	Transf	Hot Mill, East Side	<25C	0	5	Good	Not Visible	Good	None	
Gate II WW	Transf	SRWF- Gatel I	<25C	1/2#	12C	Rusted	Not Visible	Good	None	Inactive
43B MG Sei	Transf	Slab Mill, Maint Shop	25C	0	10	Good	Not Visible	: Good	None	
Stripper	Transf	Stripper Bldg	25C	1#	25	Good	Not Visible	Good '	None	AUTO-
IC	Transf	Coke Ovens, NN Bldg		No Press. Gage	40	Good	Not Visible	Good	None	
16C	Transf	Coke, S Quench St	25C	0	5	Good	Not Visione	Good	- Long de la constant	
146	Transf	Coke Ovens. FF Bldg S	22C	0	\$	Rusted	Not Visible	Fins rusted		
46E	Transf	Coke Ovens, FF Bldg S	22C	o	5	Good	Not Visible	Pressure relief	None	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

NOV 16 1998

Date:

Subject: Review of Region 5 Data for WPTD 980227 ROUGE STEEL From: Charles T. Elly, Director Region 5 Central Regional Laboratory

To:

Attached are the results for WPTD 980227 ROUGE STEEL
CRL request number 980227
for analyses for PCB IN WIPES
Results are reported for sample designations: 98TS18R01, 98TS19S01, -S03, -S04, -S05, -S09,
-S10, -S11 (8 WIPES)

Resul	ts S	tatus	
-------	------	-------	--

X		Acceptable for Use
)	Data Qualified, but Acceptable for use
,)	Data Unacceptable for Use
,)	Sewer Disposal Criteria Met; Exceptions: none

Comments on Data Quality by Reviewer

There were 3 sequence files submitted with the data package: TCJ11.S (9/21 - 22/98) - consisted of the initial 5-point calibration curves; 092398.S (9/23 - 24/98) - consisted of continuing calibrations, samples and QC samples; & 093098.S (9/30/98) - consisted of continuing calibrations and the calibration verification standards (CVSs). The CVSs should have been run on the same day as the 5-point calibration standards and once on each day of analysis; other than the CVSs being run on the final day of analysis,(this deficiency will be corrected in the future), there were no problems with the analytical sequence files.

Instrument performance audits:

Initial 5-point calibration curves for Aroclors 1260 & 1254 and TCMX/DCB (surrogates) were generally acceptable at >0.995 correlation coefficient. The continuing calibration standards were acceptable at <15% D (peak area comparisons). There was only 1 outlier (A1254-F, CJ03.D) at 19 % D. The calibration verification standards gave acceptable results.

QC samples:

PCB LCS/LCS Dup % recoveries and % Ds were acceptable. Florisil and acid cleanup control standards had acceptable % recoveries.

Surrogates:

TCMX & DCB % recoveries met QC limits of 50 - 150% recovery, ranging from 72 - 146%. The % D between columns ranged from 0 -13%. One sample (98TS19S10) required a very high dilution and the surrogates were diluted out.

Blanks:

Instrument blanks, method blank, & cleanup blanks did not contain any target PCBs.

Sample Results:

Aroclor 1260 was detected in all the samples, except for the field blank (98TS18R01), ranging from 22 - 250,000 ug/wipe. One sample, 98TS19S01, was below the 10 ug/wipe action level at 6.8 ug/wipe.

Conclusion: Data are acceptable for use.

OUALIFIERS:

U - Undetected (the analyte was analyzed for but not detected at the detection limit. The detection limits are the numbers in the amount column.)

D - Dilution required

U D - Undetected but detection limit was reported from diluted sample

Comments by Organic Team Leader

The calibration verification standards (CVS) for both aroclor 1254 and 1016/1260 were run on all three days but only the results for the finally day (9/30/98) were presented with the data set. Recoveries of the CVS were acceptable (102% and 104% respectively).

Comments by Lab Director or Quality Control Coordinator

U

nun lock alt 230 Review Record for data set WPTD 980227 ROUGE STEEL (WIPE SAMPLES)

French franzelich Erlinda Evangelista 11/13/98	11/13/58
Task Monitor/Peer Review and Date	(X) Reviewed () Unreviewed
Chi M. Tang Chi Pawg Team Leader and Date (4)	11/13/98
Team Leader and Date (5)	Reviewed () Unreviewed
George Schupp QC Coordinator and Date Lylina Juffin Data Management Coordinator and Date Date Transmitted NOV 16 19	NOV 16 1998 — Date Received

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
SL - 10C

Received by and Date

Comments:

TRANSMITTAL FORM SAMPLE RESULTS FORMS

DATA SET NO:	WPTD	980227	2-400-201-1-2-1-
SITE NAME:	ROLIGE	STEEL	(WIPES)

RENSED FIRM G/16/4 98022-AFLIUL ENVIRONMENTAL PROTECTION AGENCY FOR THE TRAME PESTICIDES & PCH'S SAMPLING DATE \$\frac{3}{25-8/27} LAH ARHIVAL DATE \$\frac{9-4-98}{2-4-98} DUE DATE PTB OU NUMBER AFL DATASET NUMBER 980227 STUDY RUNGE STEEL PHIOHITY I WIPES 1 011 1 TISSUE I SAMPLE DESCRIPTION I TISSUE IDMETIFICATION PC8°5 SAMPLES SO 1,503, | POLYCHLORINATED | CHLOHIRATED PES | PCB"3 CAL LUG THITAL MG NUMBER REPORT Suy, Sug, Sug, Slot MEZAG MG/KG MG/RL PE\$254428 PL825927 PE32441 SIL ARE G8TS19 9/14/28 CUS PES22131 PE322141 15-17/03 15-188175 15-17/014 5-171015 15-17/018 5-171024 5-171021 5-171102

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFI.101

SAMPLE ID: 98TS18R01

UNIT: UG

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 23-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	. QUALIFIER
1104-28-2	AROCLOR 1221	1.0	U
11141165	AROCLOR 1232	1.0	U
53469219	AROCLOR 1242	1.0	U
12674-11-2	AROCLOR 1016	1.0	U
12672296	AROCLOR 1248	1.0	U
11097691	AROCLOR 1254	1.0	U
11096825	AROCLOR 1260	1.0	Ç.
37324-23-5	AROCLOR 1262	1.0	()
11100-14-4	AROCLOR 1268	. 1.0	(:

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: 14 P GROUP LEADER: 2 2.0

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Page 01 of X3

Fr= 10 (Final Volume = 10 ml)

CRL REGION V

FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S01

UNIT: UG

DATE RECEIVED: 4-SEPT-98 DATE ANALYZED: 24-SEPT-98

0	x 1 &
	UD
0	UD
.0	UD
10	U D
10	UD
10	U D
5.8	D,
10	U D
10	U D
	10

\\

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: To Jupli GROUP LEADER: J. Jonesella

9. Page 02 of 13.

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SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

DATE COLLECTED: 25-28/AUGUST/98

FACILITY: ROUGE STEEL

MATRIX: WIPES

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S03

UNIT: UG

DATE RECEIVED: 4-SEPT-98 DATE ANALYZED: 24-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	. QUALIFIER
1104-28-2	AROCLOR 1221	10 '	ر U ک
11141165	AROCLOR 1232	10 ′	U D
53469219	AROCLOR 1242	10 '	U D
12674-11-2	AROCLOR 1016	10 ′	U D
12672296	AROCLOR 1248	10 '	U D
11097691	AROCLOR 1254	10 ′	UD
11096825	AROCLOR 1260	241.2 2.	D
37324-23-5	AROCLOR 1262	-10 100 ²	U D
11100-14-4	AROCLOR 1268	1()	U D

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: GROUP LEADER:

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Page 03 of 15.

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S04

UNIT: UG

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

DATE RECEIVED: 4-SEPT-98 DATE ANALYZED: 24-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	. QUALIFIER
1104-28-2	AROCLOR 1221	10	U D
11141165	AROCLOR 1232	10	υD
53469219	AROCLOR 1242	10 ′	U D .
12674-11-2	AROCLOR 1016	10 '	UŊ
12672296	AROCLOR 1248	10 '	υρ
11097691	AROCLOR 1254	10	υΔ
11096825	AROCLOR 1260	214.9	D
37324-23-5	AROCLOR 1262	-10 50 2	ti D
11100-14-4	AROCLOR 1268	10	U D

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QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: 2 huph
GROUP LEADER: 4 formythate

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- FV - 10-0 - FL - 500

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

SAMPLE BATCH ID: 980227

ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S05

UNIT: UG

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

DATE RECEIVED: 4-SEPT-98 DATE ANALYZED: 24-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	10	UD
11141165	AROCLOR 1232	10	U D
53469219	AROCLOR 1242	10	UD
12674-11-2	AROCLOR 1016	10	UD
12672296	AROCLOR 1248	10	U D
11097691	AROCLOR 1254	10	U D
11096825	AROCLOR 1260	22.7	D
37324-23-5	AROCLOR 1262	10	U D
11100-14-4	AROCLOR 1268	10	U D

jè

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: To Jumph
GROUP LEADER: & E-organist

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SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101 SAMPLE ID: 98TS19809

UNIT: UG

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 24-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	. QUALIFIER
1104-28-2	AROCLOR 1221	10	UD
11141165	AROCLOR 1232	10	UD
53469219	AROCLOR 1242	10	U D
12674-11-2	AROCLOR 1016	10 '	U D
12672296	AROCLOR 1248	10	U D
11097691	AROCLOR 1254	10	U D
11096825	AROCLOR 1260	1508	D
37324-23-5	AROCLOR 1262	10 200 ≥	C D
11100-14-4	AROCLOR 1268	10	U D
· · · · · · · · · · · · · · · · · · ·			

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: To Juph GROUP LEADER: & Languese

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1: FV-100 2: FV-2000

CRL REGION V

FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S10

UNIT: UG

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 24-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT .	QUALIFIER
1104-28-2	AROCLOR 1221	1000 ′	UD
11141165	AROCLOR 1232	1000 ′	UD
53469219	AROCLOR 1242	1000 ′	UD
12674-11-2	AROCLOR 1016	1000 ′	UD
12672296	AROCLOR 1248	1000 ′	ÚD
11097691	AROCLOR 1254	-1000 '	UD
11096825	AROCLOR 1260	250,000 2	D
37324-23-5	AROCLOR 1262	-1000− 20000°	UD
11100-14-4	AROCLOR 1268	1000 ′	UD

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY:

Page 07 of 13

Lc

, FV=10,000 FV= 200,000

CRL REGION V

FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: WIPES

ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S11

UNIT: UG

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

DATE RECEIVED: 4-SEPT-98 DATE ANALYZED: 24-SEPT-98

SAMPLE BATCH ID: 980227

CAS NUMBER	COMPOUND	AMOUNT	. QUALIFIER
1104-28-2	AROCLOR 1221	10	UD
11141165	AROCLOR 1232	10	υD
53469219	AROCLOR 1242	10	U.D
12674-11-2	AROCLOR 1016	10	Q. U
12672296	AROCLOR 1248	10	U D
11097691	AROCLOR 1254	10	U.D
11096825	AROCLOR 1260	529.3	D
37324-23-5	AROCLOR 1262	10 /00 2	U D
11100-14-4	AROCLOR 1268	1.0	U.B

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: Effet GROUP LEADER: & Jone get in

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Mary 4 & 1998

Date:

Subject: Review of Region 5 Data for Rouge Steel

From: Charles T. Elly, Director

Chrick Elly Region 5 Central Regional Laboratory

To:

Attached are the results for: Rouge Steel

CRL request number: 980227 Analyzed for: PCB (Organics)

Results are reported for sample designations: 98TS19S02, 98TS19S06 to -S08, and 98TS19S12

(5 SOIL SAMPLES)

Results Status:

(X) Acceptable for Use

) Data Qualified but acceptable for use

) Data Unacceptable for Use

Comments on Data Quality by Reviewer:

The quantified data are being reported from the DB-5 column per suggestion from the data user. Both the Method Blank and the Florisil Blank contained no target analytees above the method detection limit. The recoveries for spiked surrogate compounds TCMX and DCB were acceptable, from 81% to 121% for all samples except 98TS19S06. The DCB recovery for sample 98TS19S06 could not be calculated due to interferences. But the TCMX recovery for sample 98TS19S06 was acceptable at 116%.

Review Record for River Rouge 980227 PCB (Organic)

Recoveries for the laboratory control and laboratory control duplicate (LCS/LCSD) samples are acceptatable at 95% and 92% respectively, with RPD of 3%. Sample 98TS19S07 was used for matrix spike and matrix spike duplicate(MS/MSD) study. The recoveries are excellent, 93% for MS and 92% for MSD, with the RPD of 1%.

All five samples are positive for either aroclor 1260 or aroclor 1254. Data are acceptable for use.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for River Rouge 980227 PCB (Organic)

Peer and Task Monito	r Date	() Reviewed	() Unreviewed
Chi mi	rang	11/10/	98
Organic Team Leader	and Date	(V) Reviewed	() Unreviewed
QC Coordinato and I) l Date	/13/98 (V Reviewed	() Unreviewed
Syluia In Data Management Co	/ /	<u>NOV</u> 1.6.190 d Date Received	98
Date Transmitted	NOV 16	1998	
Please sign and date t	his form belo	ow and return it w	vith any comments to
	,	fin gement Coordinat entral Regional L	
·			
Received by and Dat	e	è	
Comments:			

CASE NARRATIVE

DATE:

September 28, 1998

PROJECT NAME: Rouge Steel (980227)

PCB analysis of Soils

ANALYST:

Amberina Khan, Chemist

REVIEWERS:

Erlinda Evangelista, GC Group Leader

Chi Tang, Organic Section Team Leader

CASE DESCRIPTION: I.

There are 5 soil samples in this data set for PCB analysis the action level is 10 ug/gm. The samples were received at on Sept. 4, 1998 and were extracted with Acetone/Hexane(1:1) mixture using Soxhlet on Sept 10, 1998. To meet the high action level, samples were spiked with surrogates at high level(10X, 2 ug of TCMX/DCB). The samples were concentrated to 10 ml and one ml of the extract was sent through a florisil column and eluted with 200 ml of n-hexane. The hexane fraction was concentrated to 10 ml and shaken with conc. Sufuric acid(1 ml) till acid layer stayed clear. The organic phase is washed with water, dried over anhydrous sodium sulfate and used for gc analysis. Sample 98TS10S08 was florisilled two times because of interferences with the pattern of PCB.

INSTRUMENT QUALITY CONTROLS: II.

- Instrument Performance Check: Initial and continuing Endrin and DDT degradation checks for both columns were not required.
- Initial Calibration Check: Five-point calibration curves were generated on both columns for the selected peaks for 1260 mixture. The correlation coefficients for all peaks were >0.995, meeting the QC acceptance limit. Calibration curves were also generated for Aroclor 1254 and surrogate mixture. Correlation coefficients were acceptable on both columns.

Continuing Calibration Check:

Continuing calibration checks for Angular 1361, Aristr 1264 & TCMX/DCB Mix (surrogate) generally met the <15 % D for area responses except for 1260-C,F G and T on DB-608 column (16 % D) for the continuing calibration on 9/22/98 and 1260-H was 16% on 9/24/98. The quantitation results are being reported from the DB-5 column so the results are not impacted.

4. Retention Time (RT) Summary: The RT % RPDs for each individual compound was acceptable on both columns, ranging from 0.00 %- 0.08 %.

III. METHOD QUALITY CONTROL:

- 1. <u>Method Blank Results:</u> 10 gms of ottawa sand was spiked with surrogates at 0.2 ug of TCMX/DCB was processed with the samples. There were no target analytes detected above the method detection limit. There were two peaks in the method blank and florisill blank that may be pthalates and may have come from the gloves. These peaks do not match any PCB pattern
- 2. Surrogate Spike Compound Results: The surrogate spike recoveries were satisfactory for TCMX/DCB(81 127 %,QC limits 50-150 %) except for sample 98TS19S06 the DCB recovery could not be calculated because there were interferences and the sample was positive at a high level for Aroclor 1260. TCMX recovery for the sample was within the QC limits.

3. Matrix Spike/Matrix Spike Duplicate(MS/MSD)Results:

The native sample was positive for Aroclor 1254, the recoveries were acceptable.

- 4. Laboratory Control Sample (LCS): 10 gms of ottawa sand was spiked with the PCB spike.LCS/LCS DUP recoveries were acceptable.
- 5. <u>Verification Standard):</u> Aroclor 1260 (1.0 ug/ML), Aroclor 1254(1 ug/ml) and TCMX/DCB mix were prepared using standards obtained from a different source and analysed. The verification standard results were satisfactory.
- IV. SAMPLE RESULTS: All samples showed the presence of Aroclor 1260 or Aroclor 1254. Sample 98TS19S07 and S08 had peaks that matched the 1254 patern closely but there were interferences

present. An average was taken and reported. The results were reported from the DB-5 column.

CREREGION V

FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: SOIL

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227

ACCOUNT NO: AFL101

SAMPLE ID: 98TS19S02

UNIT: ug GM

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 23-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	1	U
11141165	AROCLOR 1232	l	U
53469219	AROCLOR 1242	1	U
12674-11-2	AROCLOR 1016	1 .	U
12672296	AROCLOR 1248	1	Ų
11097691	AROCLOR 1254	1	U
11096825	AROCLOR 1260	25	D
37324-23-5	AROCLOR 1262	1 .	U
11100-14-4	AROCLOR 1268	1	U

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: Allace GROUP LEADER: Contage Cont

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CRL REGION V

FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: SOIL

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227

ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S06

UNIT: ug/GM

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 23-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	1	U
11141165	AROCLOR 1232	1	U
53469219	AROCLOR 1242	1	U
12674-11-2	AROCLOR 1016	1	U
12672296	AROCLOR 1248	1	U
11097691	AROCLOR 1254	1	U
11096825	AROCLOR 1260	663	D
37324-23-5	AROCLOR 1262	1	U
11100-14-4	AROCLOR 1268	1	. U

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY:

GROUP LEADER: C

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CRL REGION V FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: SOIL

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED:10-SEPT-98

SAMPLE BATCH ID: 980227

ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S07

UNIT: ug/GM

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 22-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	1	U
11141165	AROCLOR 1232	1	U
53469219	AROCLOR 1242	1	U
12674-11-2	AROCLOR 1016	1	U
12672296	AROCLOR 1248	1	U
11097691	AROCLOR 1254	10.5	D
11096825	AROCLOR 1260	1	U
37324-23-5	AROCLOR 1262	1	U
11100-14-4	AROCLOR 1268	l	Ü

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: HUMAN GROUP LEADER: 100 Fee 25

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CRL REGION V FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: SOIL

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227 ACCOUNT NO: AFL101

SAMPLE ID: 98TS19S08

UNIT: ug GM

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 29-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	2	U
11141165	AROCLOR 1232	2	Ü
53469219	AROCLOR 1242	2	U
12674-11-2	AROCLOR 1016	2	U
12672296	AROCLOR 1248	2	U
11097691	AROCLOR 1254	-84 76 cmg	D
11096825	AROCLOR 1260	2	U
37324-23-5	AROCLOR 1262	2	()
11100-14-4	AROCLOR 1268	2	()

QUALIFIERS:

U - Undetected

D - Diluted

J - Estimated

ANALYZED BY: 100 GROUP LEADER: 27/15 400

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CRL REGION V FINAL RESULTS REPORT PARAMETER: PCB

SAMPLE ORGANIZATION: WPT DIVISION

SAMPLE REQUESTOR: KENDALL MOORE

FACILITY: ROUGE STEEL

MATRIX: SOIL

DATE COLLECTED: 25-28/AUGUST/98

DATE EXTRACTED: 10-SEPT-98

SAMPLE BATCH ID: 980227

ACCOUNT NO: AFL101 SAMPLE ID: 98TS19S12

UNIT: ug/GM

DATE RECEIVED: 4-SEPT-98

DATE ANALYZED: 22-SEPT-98

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
1104-28-2	AROCLOR 1221	1	U
11141165	AROCLOR 1232	1	U
53469219	AROCLOR 1242	ì	Ū
12674-11-2	AROCLOR 1016	1	U
12672296	AROCLOR 1248	1	U
11097691	AROCLOR 1254	1	U
11096825	AROCLOR 1260	4.76	D
37324-23-5	AROCLOR 1262	! .	U
11100-14-4	AROCLOR 1268	1	U
· · · · · · · · · · · · · · · · · · ·			

QUALIFIERS:

U - Undetected

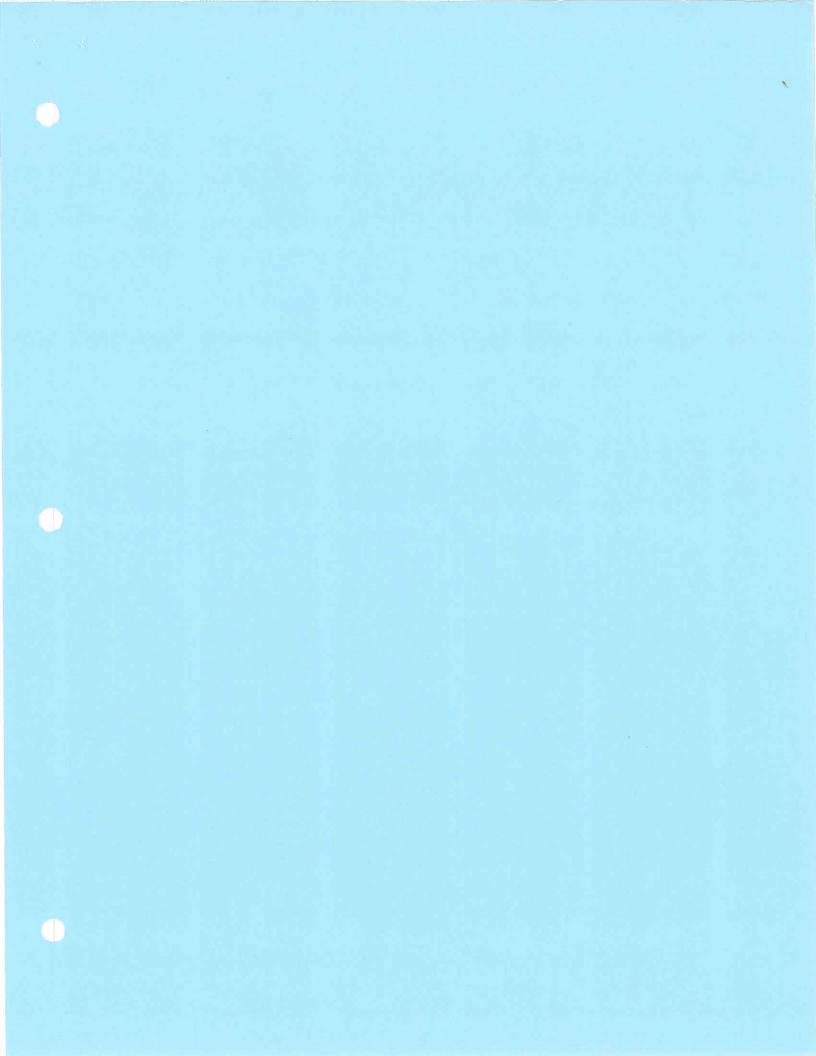
D - Diluted

J - Estimated

ANALYZED BY:

GROUP LEADER: Configure EE

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Rouge Steel Company Annual Summary Document 3001 Miller Road Dearborn, Michigan 48121 EPA ID # MID 087 738 431 January 1, 1997 - December 31, 1997

PCB Articles - In Use	Number of Units	Weight of PCBs (kg)
Transformers Capacitors Other Equipment	8 6 O O	341,706 0 0
PCB Articles - In Storage for Use		
Transformers Capacitors Containers Other Equipment Liquid PCB drums	0 0 0 0	. 0 0 0 0
PCB Articles - In Storage for Disposal		
Transformers Capacitors Solid Waste Drums Other Equipment Liquid PCB drums	0 0 0 0	0 0 0 0
Total	0	0
PCB Articles - Disposed of		
Transformers Capacitors Containers Other Equipment Bulk PCBs Liquid PCB drums Empty Drums Solid Waste Drums	2 0 3 1 1 39 1 48	10,345 0 412 59 2212 8087 22 7543 28,680

ROUGE STEEL COMPANY ANNUAL PCB EQUIPMENT REPORT January 1, 1997 - December 31, 1997

ITEM		USER		BRASS	SERIAL	SIZE	LIQUID	VOLUME	WEIGHT	STATUS
NO.	TYPE	LOCATION	MFG	TAG	NO.	(KVA)	TYPE	(GAL)	(KG)	
#1MG		SUB 3, BASEMENT	GE.	12931	6357660		PYRANOL	130	769	IN SERVICE
#2MG	REACT	SUB 3. BASEMENT	GE	12932	6357661		PYRANOL	130	769	IN SERVICE
#5	REACT	ROLLING MILL,SUB12B,J44	AC	105974	2A60213	1092	CHLOR	639	3,779	IN SERVICE
12F	TRANSF	ROLLING MILL, J36 BALCO	GE		F960326	5000	PYRANOL	860	5,086	IN SERVICE
12L5	i	ROLLING MILL, SUB12A, D1	GE	66747	5243187	500	PYRANOL	221	1,307	IN SERVICE
12L6		ROLLING MILL,J9	GE	66745	5243188	500	PYRANOL	221	1,307	IN SERVICE
12L7		ROLLING MILL, SUB12B	GE	10329	5243189	500	PYRANOL	221	1,307	IN SERVICE
12L8		ROLLING MILL, J60 BALCO	GE	66749	5243190	500	PYRANOL	221	1,307	IN SERVICE
12L9	L	ROLLING MILL, G54 BALC	GE	66746	5243185	500	PYRANOL	221	1,307	IN SERVICE
12M	TRANSF	ROLLING MILL, YZ45	WEST	89259	3060871	3000	INERT	892	5,275	IN SERVICE
12Q	TRANSF	ROLLING MILL,#2 TANDE	GE		C863565	2500	PYRANOL	1025	6,062	IN SERVICE
1D1	TRANSF	HILINE ROAD 4 AREA	GE		D573820	2020	PYRANOL	1115	6,594	IN SERVICE
1D2	TRANSF	HILINE ROAD 4 AREA	GE		D573821	2020	PYRANOL	1115	6,594	IN SERVICE
1D3	TRANSF	HILINE	GE		D573822	2020	PYRANOL	1115	6,594	IN SERVICE
1D4	TRANSF	HILINE	GE		D573823	2020	PYRANOL	1115	6,594	IN SERVICE
1D5	TRANSF	HILINE SOUTH END	GE		D573819	2020	PYRANOL	1115	6,594	IN SERVICE
21G1	TRANSF	S. SIDE ROAD 4, J15	WEST	81301	2351491	2000	INERT	603	3,566	IN SERVICE
21G2	TRANSF	S. SIDE ROAD 4, J15	AC	86556	1684001	2000	CHLOR	658	3,891	IN SERVICE
21GL9	TRANSF	S. SIDE ROAD 4, J15	GE	81325	5808757	500	PYRANOL	245	1,449	IN SERVICE
24A#4	TRANSF	ROLLING MILL, K32	GE		1817165	833	PYRANOL	375	2,218	IN SERVICE
24C1	TRANSF	ROLLING MILL, J34	GE		957943A	1500	PYRANOL	225	1,331	IN SERVICE
24C2	TRANSF	ROLLING MILL, J55	GE		957943B	1500	PYRANOL	225	1,331	IN SERVICE
24S1	TRANSF	ROLLING MILL, A42	AC		767731	2000	CHLOR	345	2,040	IN SERVICE
24S2	TRANSF	ROLLING MILL, A42	AC		76773	2000	CHLOR	345	2,040	IN SERVICE
24T1	TRANSF	ROLLING MILL, #2 TANDE	GE		C8635364	1500	PYRANOL	410	2,425	IN SERVICE
24T2	TRANSF	ROLLING MILL, #2 TANDE	GE	_	C8635363	1500	PYRANOL	410	2,425	IN SERVICE
27A1	TRANSF	ROLLING MILL	ITE	418768	697559	4000	ASKEREL	1025	6,062	IN SERVICE
27B1	TRANSF	BOF, W. SIDE BAGHOUSE	ITE		1007963	1500	ASKAREL	540	3,193	IN SERVICE
27B2	TRANSF	BOF, W. SIDE BAGHOUSE	ITE	-	1007863	1500	ASKAREL	540	3,193	IN SERVICE
27C1	TRANSF	BOF, D23, SERVICE FLOOR	ITE	-	985263	2500	ASKAREL	678	4,010	IN SERVICE
27C2	TRANSF	BOF, D23, SERVICE FLOOR	ITE		985163	2500	ASKAREL	678	4,010	IN SERVICE
27D	TRANSF	RSC/BASIC OXYGEN FURN	-	6-	1008063	1272	ASKAREL	842	4,979	IN SERVICE

30C1	TRANSF	B ROAD NEAR ROAD 4	GE		E956755A	3000	PYRANOL	440	2,602	IN SERVICE
30C2	TRANSF	B ROAD,NEAR ROAD 4	GE		F956755B	3000	PYRANOL	440	2,602	IN SERVICE
43D1	TRANSF	SLABBING MILL, MOTOR	GE		962443A	1280	PYRANOL	390	2,306	IN SERVICE
43D1 43D2	TRANSF	SLABBING MILL, MOTOR	GE		962443C	1280	PYRANOL	390	2,306	IN SERVICE
43D3	TRANSF	SLABBING MILL, MOTOR	GE		962443D	1280	PYRANOL	390	2,306	IN SERVICE
43D4	TRANSF	SLABBING MILL, MOTOR	GE	**	962443B	1280	PYRANOL	390	2,306	IN SERVICE
43E1	TRANSF	SLABBING MILL, MOTOR	AC		4483582	2000	CHLOR	363	2,147	IN SERVICE
43E2	TRANSF	SLABBING MILL, MOTOR	AC		4483583	2000	CHLOR	363	2,147	IN SERVICE
43F1	TRANSF	SLABBING MILL, MOTOR	AC		4483580	2000	CHLOR	363	2,147	IN SERVICE
43G2	TRANSF	SLABBING MILL, MOTOR	AC		4483584	2000	CHLOR	363	2,147	IN SERVICE
43H2	TRANSF	SLABBING MILL, E OF OFF	AC		4476906	2000	CHLOR	363	2,147	IN SERVICE
431	TRANSF	SLABBING MILL MOTRMB	AC		4483810	1000	CHLOR	239	1,413	IN SERVICE
44B1	TRANSF	HOT STRIP MILL, K26	GE		H874808F	10000	PYRANOL	1480	8,752	IN SERVICE
· 44C1	TRANSF	HOT STRIP MILL, L43	GE		H874808C	10000	PYRANOL	1480	8,752	IN SERVICE
44C2	TRANSF	HOT STRIP MILL, L43	GE		H874808D	10000	PYRANOL	1480	8,752	IN SERVICE
44C3	TRANSF	HOT STRIP MILL, L43	GE		H874808B	10000	PYRANOL	1480	8,752	IN SERVICE
44C4	TRANSF	HOT STRIP MILL, L43	GE		H874808A	10000	PYRANOL	1480	8,752	IN SERVICE
44D1	TRANSF	HOT STRIP MILL, K22	AC		302644	2000	CHLOR	354	2,093	IN SERVICE
44D2	TRANSF	HOT STRIP MILL,K22	AC		302643	2000	CHLOR	354	2,093	IN SERVICE
44E1	TRANSF	HOT STRIP MILL, K28	AC	••	5845783	2000	CHLOR	363	2,147	IN SERVICE
44E2	TRANSF	HOT STRIP MILL, K28	AC		5845784	2000	CHLOR	363	2,147	IN SERVICE
44F1	TRANSF	HOT STRIP MILL, K47	AC		5845891	2000	CHLOR	363	2,147	IN SERVICE
44F2	TRANSF	HOT STRIP MILL, K47	AC		5845893	2000	CHLOR	363	2,147	IN SERVICE
44G1	TRANSF	HOT STRIP MILL, K59	AC		5845895	2000	CHLOR	363	2,147	IN SERVICE
44G2	TRANSF	HOT STRIP MILL, K59	AC		5845896	2000	CHLOR	363	2,147	IN SERVICE
44H1	TRANSF	HOT STRIP MILL, H73	AC		5845897	2000	CHLOR	363	2,147	IN SERVICE
44H2	TRANSF	HOT STRIP MILL, H73	AC		5845892	2000	CHLOR	363	2,147	IN SERVICE
45C1	TRANSF	ELECT FURNACE, SOUTH	AC		80554	5000	CHLOR	674	3,986	IN SERVICE
45C2	TRANSF	ELECT FURNACE, SOUTH	AC		805541	5000	CHLOR	674	3,986	IN SERVICE
45D1	TRANSF	ELECT FURNACE, MAINT.	WEST		PAV762602	1500	INERT	358	2,117	IN SERVICE
45D2	TRANSF	ELECT FURNACE, MAINT.	WEST		PAV762601	1500	INERT	358	2,117	IN SERVICE
45E1	TRANSF	ELECT FURNACE, MAINT.	AC		803641	2000	CHLOR	270	1,597	IN SERVICE
45E2	TRANSF	ELECT FURNACE, MAINT.	AC		80364	2000	CHLOR	270	1,597	IN SERVICE
46A1	TRANSF	COKE OVENS, WW BLDG,E	GE		F956361B	2500	PYRANOL	440	2,602	IN SERVICE
46A2	TRANSF	COKE OVENS, WW BLDG,E	GE		F956361F	2500	PYRANOL	440	2,602	IN SERVICE
46B2	TRANSF	COKE OVENS, WW BLDG,E	GE		F956361C	2500	PYRANOL	440	2,602	IN SERVICE
4A3	TRANSF	ROW B28 BASEMENT	GE	79937	5589495	2000	PYRANOL	452	2,673	IN SERVICE
4B4	TRANSF	ROW B12 BASEMENT	GE	79936	5589498	2000	PYRANOL	452	2,673	IN SERVICE
4L1	TRANSF	ROW F28 BASEMENT	GE	79931	5637230	500	PYRANOL	245	1,449	IN SERVICE
4L2	TRANSF	ROW G20 BASEMENT	GE	79935	5637231	500	PYRANOL	245	1,449	IN SERVICE

4L3	TRANSF	ROW F13 BASEMENT	GE	79930	5637229	500	PYRANOL	245	1,449	IN SERVICE
4L4	TRANSF	ROW F5 BASEMENT	GE	79933	5637228	500	PYRANOL	245	1,449	IN SERVICE
FM1	TRANSF	HOT STRIP MILL, EAST SID	WEST		2CP76621	7682	INERT	2380	14,075	IN SERVICE
	TRANSF	HOT STRIP MILL, EAST SID	WEST		2CP76626	7500	INERT	2380	14,075	IN SERVICE
FM4	TRANSF	HOT STRIP MILL, EAST SID	WEST		2CP76624	7500	INERT	2380	14,075	IN SERVICE
FM5		HOT STRIP MILL, EAST SID	WEST		2CP76625	7500	INERT	2380	14.075	IN SERVICE
FM6	TRANSF	HOT STRIP MILL, EAST SID	WEST		2CP76623	7500	INERT	2380	14.075	IN SERVICE
FM7	TRANSF	<u> </u>	GE		F962762	3750	PYRANOL	980	5,796	IN SERVICE
MG SET	TRANSF	SLABBING MILL, MAINTS	GE		H409970	1715	PYRANOL	376	2,224	IN SERVICE
STRIPPER	TRANSF	STRIPPER BLDG		<u> </u>		3000	INERT	892	5.275	OUT-OF-SER
1C	TRANSF	COKE OVENS, NN BLDG	WEST	87553	2801378					
46C	TRANSF	COKE OVENS, S QUENCH S	AC		557508	3750	CHLOR	755	4,465	OUT-OF-SER
46D	TRANSF	COKE OVENS, FF BLDG, S	AC	-	79670	3750	CHLOR	342	2,023	OUT-OF-SER
46E	TRANSF	COKE OVENS, FF BLDG, \$	AC		796701	3750	CHLOR	342	2,023	OUT-OF-SER
FM0	TRANSF	HOT STRIP MILL, EAST SID	WEST		2CP76622	7500	INERT	2380	14,075	OUT-OF-SER

Total In Service Transformers 86
Total Gallons of PCB In Service 57,781
Total Kg of PCBs In Service 341,706

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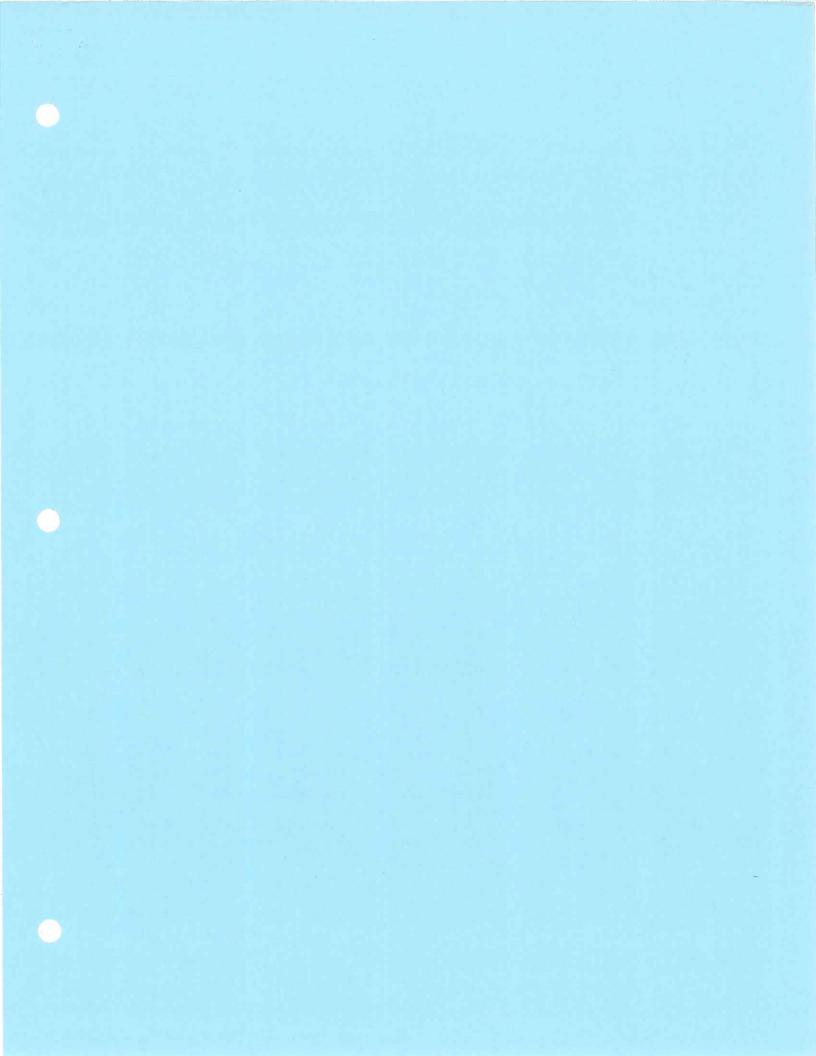
Owner/Description	Type of Container	Type	Senal # or Container #	Record Date	Weight (fb)	Weight (kg)	Date of Transport	Manifest No	Arrival at Disposal Site	Date of Disposal	Disposal Site
Disposed of by Ford:											
RSC 21G	55 gal Drum	Solid	S - 160	6/14/96	118	54	1/7/97	991197	1/17/97	2/25/97	Rollins
RSC 21G	55 gal Drum	Solid	S - 161	6/28/96	95	43	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 21G	55 gal Drum	Solid	S - 164	8/1/96	101	46	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 21G2 & 21G3	55 gal Drum	Solid	S - 165	8/26/96	128	58	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 136	8/21/96	741	337	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 137	8/21/96	742	337	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 138	8/21/96	710	323	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 139	8/21/96	704	320	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 140	8/21/96	723	329	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 141	8/21/96	520	236	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 142	8/21/96	750	341	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Dirt	55 gal Drum	Solid	S - 143	8/21/96	695	316	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Scrap	55 gal Drum	Solid	S - 135	8/21/96	142	65	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27A Scrap, PPE	55 gal Drum	Solid	S - 158	8/22/96	145	66	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 278 Dirt	55 gal Drum	Solid	S - 145	9/12/96	682	310	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27B Dirt	55 gal Drum	Solid	S - 146	9/21/96	635	289	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27B Dirt	55 gal Drum	Solid	S - 147	9/21/96	666	303	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27B Dirt	55 gal Drum	Solid	S - 148	9/21/96	660	300	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27B Dirt	55 gal Drum	Solid	S - 149	9/21/96	638	290	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC 27B Dirt	55 gal Drum	Solid	S - 150	9/21/96	209	95	1/7/97	991197	1/17/97	2/26/97	Rollins
RSC Factory Scrap	55 gal Drum	Solid	S - 167	12/3/96	185	84	1/7/97	991197	1/17/97	2/26/97	Rollins
Disposed of by RSC:		<u> </u>	1								
27A-2 Transformer	Transformer	Solid	985463	2/6/97	15664	7105	2/11/97	4355159		2/19/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150001	2/5/97	750	341	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150002	2/5/97	750	341	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150003	2/5/97	750	341	2/8/97	4355156	A	3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150004	2/5/97	750	341	2/8/97	4355156	ļ <u></u>	3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150005	2/5/97	750	341	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150006	2/5/97	750	341	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150007	2/5/97	750	341	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Askarel	55 gal Drum	Liquid	DT150008	2/5/97	750	341	2/8/97	4355156	<u> </u>	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150009	2/6/97	444	202	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150010	2/6/97	444	202	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150011	2/6/97	444	202	2/8/97	4355156		3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150012	2/6/97	444	202	2/8/97	4355156	1	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150013	2/6/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers

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Owner/Description	Type of Container	Туре	Serial # or Container #	Record Date	Weight (lb)	Weight (kg)	Date of Transport	Manifest No	Arrival at Disposal Site	Date of Disposal	Disposal Site
27A-2 Water	55 gal Drum	Liquid	DT150014	2/7/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150015	2/7/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150016	2/7/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150017	2/7/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Water	55 gal Drum	Liquid	DT150018	2/7/97	444	202	2/8/97	4355156	2/10/97	3/13/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150019	2/5/97	110	50	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150020	2/6/97	660	300	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150021	2/6/97	99	45	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150022	2/6/97	110	50	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150023	2/6/97	132	60	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150024	2/7/97	99	45	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150025	2/7/97	132	60	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150026	2/7/97	99	45	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150027	2/7/97	330	150	2/8/97	4355156	2/10/97	6/25/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150028	2/7/97	99	45	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150031	2/7/97	176	80	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Debris	55 gal Drum	Solid	DT150032	2/7/97	99	45	2/8/97	4355156	2/10/97	3/15/97	SD Meyers
27A-2 Transformer Pan	Metal pan	Solid	DT150029	2/7/97	53	24	2/8/97	4355156	2/10/97	3/6/97	SD Meyers
27A-2 Transformer Pan	Metal pan	Solid	DT150030	2/7/97	53	24	2/8/97	4355156	2/10/97	3/6/97	SD Meyers
Scrap drum	55 gal Drum	Solid	020597-1	2/5/97	60	22	6/9/97	2945941	6/9/97	<u> </u>	SD Meyers
OCIGE CITY						<u> </u>	6/20/97	1426284	6/23/97	6/29/97	CWM
27A Debris	55 gal Drum	Solid	RS27004S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27005S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27007S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Debris	55 gal Drum	Solid	RS27008S	2/7/97	350	159	3/11/97	1112695	1	4/25/97	Rollins
27A Debris	55 gal Drum	Solid	RS27009S	2/7/97	350	159	3/11/97	1112695	4	4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27010S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27011S	2/7/97	350	159	3/11/97	.1112695	4/16/97	4/25/97	Rollins
27A Debris	55 gal Drum	Solid	RS27012S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27013S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/25/97	Rollins
27A Debris	55 gal Drum	Solid	RS27014S	2/7/97	350	159	3/11/97	1112695		4/23/97	Rollins
27A Debris	55 gal Drum	Solid	RS27015S	2/7/97	350	159	3/11/97	1112695	<u> </u>	4/25/97	Rollins
27A Debris	55 gal Drum	Solid	RS27017S	2/7/97	350	159	3/11/97	1112706	· · · · · · · · · · · · · · · · · · ·	5/1/97	Rollins
27A Debris	55 gal Drum	Solid	530-1	2/7/97	220	100	3/20/97	1112697	4/9/97	5/8/97	Rollins
27A Water	55 gal Drum	Liquid	RS27002S	2/7/97	350	159	3/11/97	1112695	ļ	5/1/97	Rollins
27A Water	55 gal Drum	Liquid	RS27003S	2/7/97	350	159	3/11/97	1112695	4/16/97	5/1/97	Rollins

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Owner/Description	Type of Container	Type	Serial # or Container #	Record Date	Weight	Weight (kg)	Date of Transport	Manifest No	Arrival at Disposal	Date of Disposal	Disposal Site
	Committee		"""	W.,	1,000	vi9 <i>i</i>			Site	TA INTERNAL	
074 W. /	EE and Down	Liquid	RS27006S	2/7/97	350	159	3/11/97	1112695	4/16/97	5/1/97	Rollins
27A Water	55 gal Drum 55 gal Drum	Liquid	RS27006S	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS270103	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water		Liquid	RS27002L	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum		RW27004L	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid		2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS27005L			159	ŀi			4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS27006L	2/7/97	350		3/11/97	1112695	4/16/97		
27A Water	55 gal Drum	Liquid	RS27007L	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS27008L	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS27010L	2/7/97	350	159	3/11/97	1112695	4/16/97	4/30/97	Rollins
27A Water	55 gal Drum	Liquid	RS27009L	2/7/97	350	159	3/11/97	1112706	3 /19/97	5/1/97	Rollins
27A Water	55 gal Drum	Liquid	565-1	2/7/97	350	159	3/11/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-2	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-3	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-4	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-5	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-6	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-7	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
27A Water	55 gal Drum	Liquid	565-8	2/7/97	350	159	3/20/97	1112697	4/9/97	5/25/97	Rollins
Gate 11, WW Treatment	Transformer	Solid	6530707	12/29/97	7128	3240	12/29/97	4581651	12/30/97	2/4/98	SD Meyers
Metal box	Box	Solid	Metal Box	12/29/97	801	364	12/29/97	4581651	12/30/97	3/16/98	SD Meyers
Portable tank	Tank	Liquid	ortable Tan	12/29/97	4866	2212	12/29/97	4581652	12/30/97	1/12/98	SD Meyers
WW-1 Debris	55 gal Drum	Solid	122997-1S	12/29/97	18	8	12/29/97	4581652	12/30/97	1/25/98	SD Meyers
WW-1 Debris	55 gal Drum	Solid	122997-2S	12/29/97	26	12	12/29/97	4581652	12/30/97	1/25/98	SD Meyers
WW-1 Pipe	Pipe	Solid	Pipe	12/29/97	130	59	12/29/97	4581652	12/30/97	2/25/98	SD Meyers
				·							
PCB Articles Disposed of:		Units	Weight, kgs					,		:	
Transformers		2	10345								,
Capacitors	ļ	0	0					-		:	.
Containers		3	412		L				ļ		
Other Equipment		1	59		L						
Bulk PCBs	<u> </u>	1	2212							İ	***************************************
Liquid PCB Drums		39	8087								
Empty Drums	<u> </u>	1	22			ļ _			+		:
Solid Waste Drums		48	7543		ļ						
Totals		95	28680			<u>.</u>					





June 5, 1997

Subject: PCB Quarterly Inspection Report, 2nd Quarter, 1997

This report Serves to certify that a visual inspection of each PCB transformer (as defined in 40 CFR 761.3) in use or stored for reuse has been performed between April 1- June 30, 1997. All transformers in the RSC areas were found to be free of leaks during this inspection period with the exception of those noted otherwise in the body of this report.

The visual inspections were devised to detect the occurrence of any leak of Dielectric fluid on or around any of the transformers. If any leak is detected, it will be noted on the Operator's log, Clipboard/ Daily log will be placed followed by daily inspections. These daily inspections will continue until the repair and confirmation is completed. If there is any Spill Cleanup required, it shall be initiated no later than 48 hours following discovery.

LEAKS THAT EXISTED AS OF 6/30/97 AND ARE BEING INSPECTED ON A DAILY BASIS:

NONE AT PRESENT

LEAKS THAT EXISTED AND WERE REPAIRED/STOPPED DURING THE QUARTER:

- 1. 12L6 transformer, leak detected 3/27/97, Leak repaired 4/28/97.
- 2. 12L8 transformer, leak detected 4/22/97, Leak repaired 4/28/97.
- 3. 12L9 transformer, leak detected 4/22/97, Leak repaired 4/29/97.

OTHER THAN ROUTINE WORK PERFORMED ON THE FOLLOWING PCB UNITS:

NONE AT PRESENT

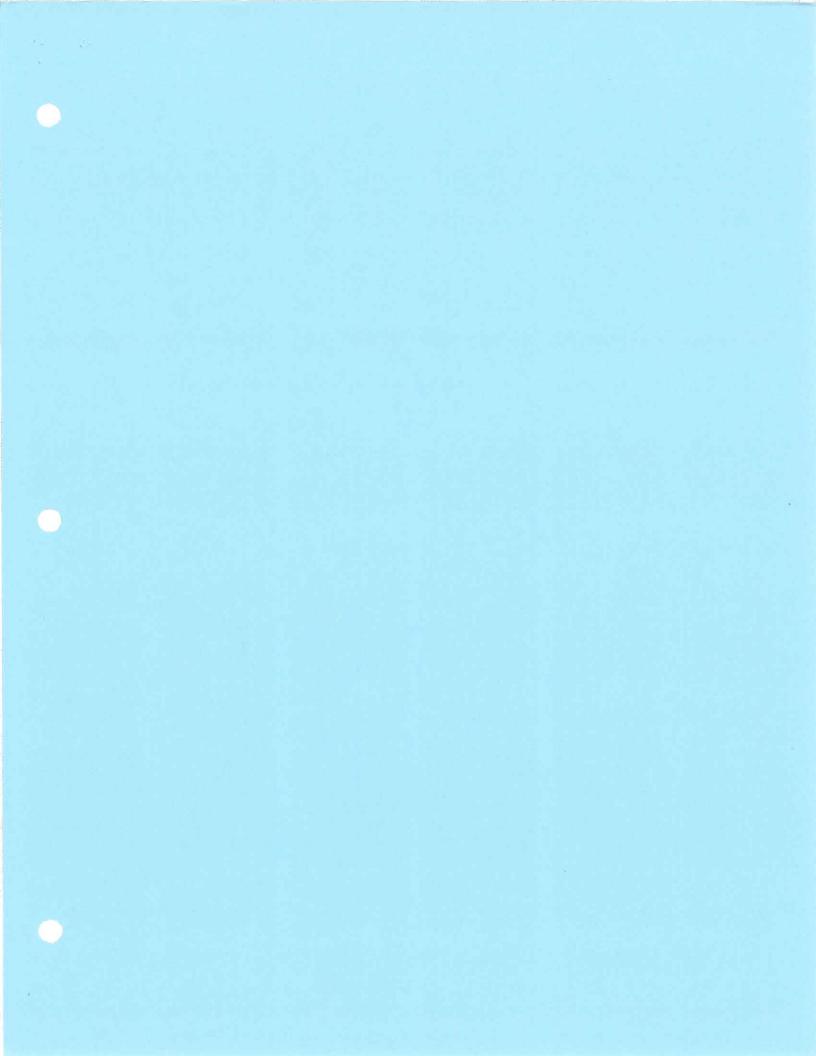
CLEANUP(S) IN PROGRESS AT THE FOLLOWING LOCATION(S)

1. 27A Transformer Dike, Cleanup Initiated

With the exception of the Spill at 27A2 (50gal-100gal), all other leaks have involved less than 10lbs. All Records Required by Law are maintained at our Environmental Engineering Office. If there are any questions or the need for further information, Please contact me at, 313-594-7375.

Charles B, Johnson

Environmental Control Engineer ROUGE STEEL COMPANY



Rouge Steel Company was restructured in 1997 into a holding company organization. Rouge Industries became the parent holding company of Rouge Steel and several joint ventures. Now all the pieces are in place for Rouge Industries to capitalize on its competitive strengths.

In 1997, Rouge Industries shipped a record 3,029,000 tons, exceeding the 1996 shipment level by 153,000 tons. This record was achieved during a period of limited production caused

by the scheduled reline and upgrade of one of the Company's blast furnaces.

Total sales in 1997 were a record \$1.3 billion, up 2.6% from 1996. Net income in 1997 was \$22.4 million, or \$1.02 per share, compared to \$23.4 million and \$1.07 per share in 1996.

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A LETTER TO OUR VA

Almost four years ago, Rouge Steel Company formulated a plan where the Company would use the proceeds from its initial public offering to retire its debt and commence the process of improving and diversifying its internal steel making capability and product offerings.

Since then, our people have been focused on executing that plan. The Company has invested more than \$350 million to add a third strand to our continuous caster, reline both of our blast furnaces, modernize our hot and cold rolling operations, enhance the production capacity of our electrogalvanizing joint venture and build a new joint venture hot dipped galvanizing facility. The result is a balanced steel making operation with the capability of annually producing nearly three million tons of the highest quality steel products for the most discriminating and demanding steel customers in the world – the automotive companies and their suppliers.

These same facilities improvements, which have allowed us to increase our sales volume by almost 20% since 1993, have also enabled us to produce a broader range of higher grade steel products that are critical to the Company's long-term viability.

This past year, we completed the reline of one blast furnace and installed a new raw material handling system, both of which will contribute to increased iron production and lower costs. During the construction of these two facilities, it was necessary to purchase 619,000 tons of slabs to balance our internal steel production with

LUED SHAREHOLDERS

the demands from our customers in order to maintain an uninterrupted supply. While these slab purchases had an adverse effect on profit margins, they nevertheless allowed us to maintain the customer base required to support the capacity increase generated by our current facilities improvements.

The second phase of our plan was to establish strategic affiliations with outside steel processing experts to enhance the Company's ability to successfully enter new markets with an expanded array of value-added products. To facilitate the orderly expansion and management of these downstream joint venture companies, Rouge Steel Company has been restructured into a holding company organization. As a result, Rouge Industries is now comprised of Rouge Steel and a variety of value-added businesses, including hot dipped galvanizing, first operation blanking, laser welded blanking and other steel processing ventures, that add value to Rouge Steel's products. In each case, our joint venture partner is among the leaders in its respective field.

We can now look forward to 1998 with great anticipation and expectation. The launches of Spartan Steel Coating, Delaco Steel Processing and Bing Blanking, combined with the ability to fully utilize Rouge Steel's balanced steel making operations, have us poised to move the Company to a higher performance level, with lower operating costs, improved profits and increased shareholder value. Thank you for your continuing support.

Cal Nacisui

Chairman and Chief Executive Officer

S Y The whole

Virtually all key elen Rouge I new fa impro and ro turing gram place

Steel piping is used for its strength and durablility.

Virtually all of the key elements of Rouge Industries' new facilities improvements and restructuring program are in place. The third caster strand, which

i s

was completed in 1996, allows the Company to continuously cast 100% of its liquid steel and eliminates the higher cost, lower quality ingot process. Additionally, the third strand enables Rouge Steel to produce high carbon and high alloy steel products and to answer the more demanding and sophisticated needs of the automotive market as well as other end user markets.

The relines of the Company's blast furnaces were completed during 1996 and 1997. These upgrades improved productivity which allows Rouge Steel to more fully utilize its caster capability.

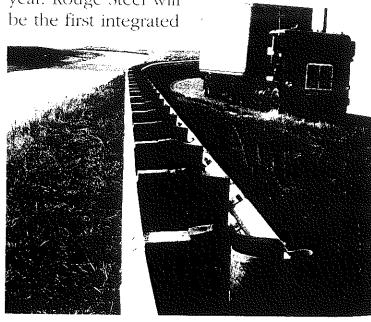
Rouge Steel has installed the industry's most modern automated raw material handling system which selects, screens, weighs and delivers all of the raw materials that comprise a blast furnace bur-

den. It also ensures precise furnace charging which increases

blast furnace production.

greater

The Company's newest endeavor, the waste oxide reclamation facility, is part of continuing efforts to improve the environment and reduce costs. Its construction will be completed in mid-1998. The facility will recover iron units from approximately 300,000 tons of iron-bearing waste oxides generated annually by Rouge Steel. This reclaimed iron product will be mixed at the BOF with hot metal from the blast furnaces and is expected to increase hot band production by 124,000 tons per year. Rouge Steel will



Guard rails made of galvanized steel are strong, safe and economical

R G Y ne sum of the parts

steel company to install this type of waste oxide reclamation facility which will prevent hundreds of thousands of tons of waste oxides from being landfilled.

The Company didn't stop there. Rouge Steel has added a new fully-automated gauge control system and ancillary equipment to its tandem mill to improve productivity and downstream yields. The new equipment further allows the tandem mill to roll coils to within 1% of aim thickness.

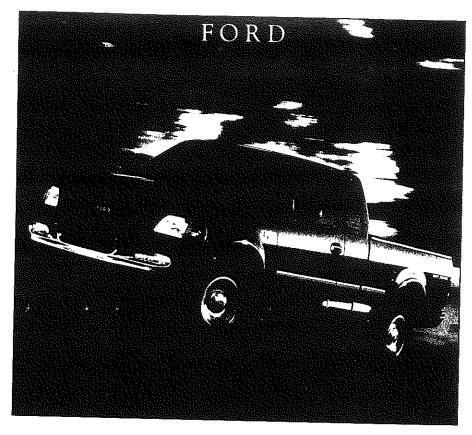
Rouge Industries' new hot dip galvanizing joint venture, Spartan Steel, anticipates running its first coils by mid-1998. When Spartan Steel is fully operational, it is expected to produce approximately 450,000 tons annually of galvanized and galvanneal products, primarily for automotive applications. This joint venture will not only provide an outlet for Rouge Steel's uncoated cold rolled product, it will also provide the Company with a strong presence in the hot dip galvanized market.

Each of these programs was undertaken with specific business



Spartan Steel Coating will produce high quality galvanized and galvanneal products.

cient, profit-enhancing investment. But the synergy created by the combination of these programs will significantly improve Rouge Industries' position in what continues to be a highly competitive marketplace.





Nobody serves the steel custom

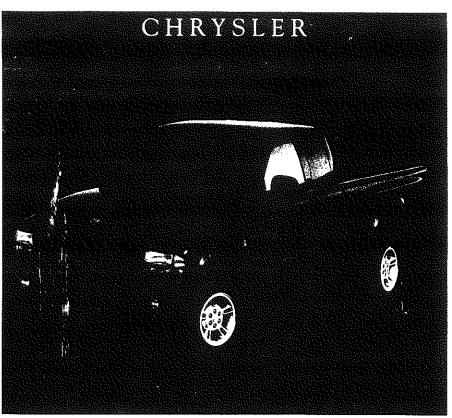
he demand for more sophisticated steel products keeps growing and Rouge Industries continues to respond with product mix enhancements. By improving the quality and mix of its value-added products, Rouge Industries has expanded its core automotive

business to include blanked, hot dipped galvanized, high carbon and alloy steel products. These products have generated new sales opportunities with Ford, Chrysler, General Motors and other companies.

Many of these opportunities are a result of the Company's

VALUE





r better than Rouge Industries

investment in value-added steel processing joint ventures such as Spartan Steel Coating, a hot dipped galvanizing facility with the capacity to coat 450,000 net tons of steel annually, and Shiloh of Michigan, an engineered steel blanking facility with the capacity to produce 100,000

tons of steel blanks yearly.

With nearly 80 years of automotive steel making experience and a highly skilled and dedicated work force, Rouge Industries will continue the strong relationship with its customers – to not only meet their expectations, but to exceed them!

ADDED

TECHNOLOGY QUALITY

increase value-added capabilities

Rouge Industries' continuing application of the latest technologies and strong emphasis on product quality have led to increasing business with the automotive industry's Big Three and their suppliers. Ford, Chrysler and General Motors not only demand flat rolled tudie-added steel products that perform in their plants, they demand excellent value tacked by superior service.

Today, the Company manufactures a wide liety of higher carbon and alloy steels for any new and diverse applications. From cated steel for automotive inner body parts and electrogalvanized steel for outer body parts to more complex and critically designed parts that require laser welded steel blanks, Rouge Industries is committed to utilizing energing technologies that will result in better steel solutions for its customers.

Technological capability and quality are always prime considerations for Rouge Industries, whether in the selection of an ergineering firm to design and construct a new facility or the choice of a partner for a vane-added steel processing venture. Rouge Industries values its joint venture companies and the products and services they provide. The Company also values its strategic partners help these important business enterprises be successful. They play a vital role in Rouge Industries' growing success.

JOINT VENTURE <u>COMPANIES</u>

Double Eagle Steel Coating Company

Shiloh of Michigan

Spartan Steel Coating ROUGE INDUSTRIES' PARTNERS

USS

Shiloh Industries

Worthington Industries

TWB Company Worthing

Worthington Industries/ Bethlehem Steel/ Thyssen/LTV

Bing Blanking

Bing Management

Delaco Steel Processing

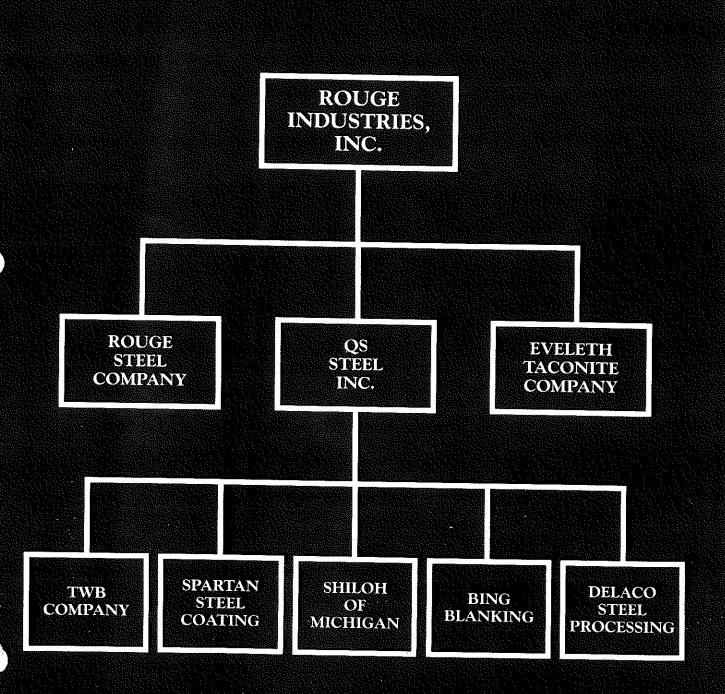
Delaco Steel

EVTAC Mining

AK Steel/Stelco Inc.

PRODUCT AND

Downstream technologies significantly



SPIRIT

The spirit to succeed is exactly what you would expect from Rouge Industries

The Rouge Industries corporate culture is unique.

Rooted in nearly eight decades of partnering with its automotive customers to produce the material of choice, its corporate culture reflects a hard work ethic which is part of the heritage of the people who do the real work in this competitive automotive steel business. It is a pioneering spirit that welcomes challenge. It is a genuine team spirit that motivates employees in every department, in every operation to do whatever it takes to serve the customer better. It is a spirit that calls for continuous improvement in product quality, customer service and delivery. It is a spirit that instills pride in getting the job done right the first time and every time. It is an important part of what makes Rouge Industries America's Steel Company.

The Company's UAW-represented production and maintenance employ-

ees are essential partners in Rouge Industries' quest for quality, productivity, and profitability. As shareholders of Rouge Industries, the employees and management have a significant stake in the Company's financial success.

Rouge Industries partners with its customers in an unwavering effort to deliver the best products and solutions possible. While looking for new ways to improve its product offerings, Rouge Industries maintains its high standards of quality – ton after ton.

Rouge Industries is not only committed to building quality steel products, but quality business relationships as well. The Rouge Industries team knows that the stronger the customer relationships, the more successful the future.



Management's Discussion and Analysis of Financial Condition and Results of Operations

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Overview

The following discussion should be read in conjunction with, and is qualified in its entirety by reference to, the Consolidated Financial Statements which begin on page 26.

Rouge Steel Company ("Rouge Steel") and its subsidiaries were reorganized into a holding company structure effective July 30. 1997. Pursuant to the reorganization, Rouge Steel became a wholly-owned subsidiary of the new holding company. Rouge Industries, Inc., a Delaware corporation (together with its subsidiaries, "Rouge Industries" or the "Company"). Rouge Industries, which was incorporated in 1996, is the issuer of all shares of Class A Common Stock and Class B Common Stock outstanding. On the reorganization date, Rouge Industries and its subsidiaries had the same consolidated net worth as Rouge Steel and its subsidiaries prior to the reorganization.

Rouge Steel is an integrated producer of high quality, flat rolled steel products consisting of hot rolled, cold rolled and electrogalvanized steel. In recent years, the Company has emphasized the production of value-added flat rolled carbon steel products that require additional processing and generally command higher margins than commodity flat rolled carbon steel products. The Company's products generally, and its value-added products specifically, are sold primarily to customers in the automotive industry which have exacting quality, delivery and service requirements. The Company also sells its products to steel converters, service centers and other end users.

Other wholly owned subsidiaries of Rouge Industries are Q8 Steel Inc. ("Q8 Steel") and Eveleth Taconite Company ("Eveleth"). Q8 Steel holds minority ownership interests in five Michigan-based joint ventures. Eveleth holds a 15° interest in Eveleth Mines LLC ("EVTAC"), a Minnesota-based iron ore mining and pellet producing operation.

Since the acquisition of the Company from Ford Motor Company ("Ford") in 1989 (the "Acquisition"). Rouge Industries' current management has transformed the Company from an adjunct to Ford's automotive manufacturing business into an independent, marketdriven business. In order to strengthen relationships with existing customers and establish relationships with new customers, the Company has focused on a number of strategies designed to improve the quality of its products, increase the efficiency of its operations, reduce operating expenses and improve its product mix, including increased sales of higher margin value-added steel products. The Company has reported net income every year since the Acquisition except 1992 when the impact of changes in accounting principles resulted in a \$5.1 million loss. In the eight years since the Acquisition, Rouge Industries has undertaken a capital investment program designed to improve quality. product mix and productivity. In 1995, the Company and United States Steel Corporation expanded the capacity of Double Eagle Steel Coating Company ("Double Eagle"), which permits Rouge Industries to produce an additional 52,500 net tons of value-added electrogalvanized steel product annually. In 1996, the Company partially relined its larger blast furnace and launched the second ladle refining facility and the third strand of its continuous caster. These additions permit the Company to refine and continuously cast 100% of its liquid steel, eliminate the need to utilize the higher cost, lower quality ingot process and produce a greater proportion of value-added steel, in 1997, the Company installed a new raw material handling system, finished a major reline of its smaller blast furnace and upgraded its hot and cold mill facilities. Additionally, the Company invested in Spartan Steel Coating, L.L.C. ("Spartan Steel"), a 48%-owned joint venture with Worthington Industries, Inc. (together with its subsidiaries, "Worthington").

Rouge Steel's operations are subject to the cyclicality of the steel industry and the domestic economy as a whole. During the last major downturn in the steel industry, domestic steel industry production fell to approximately 87.9 million tons in 1991 from an annual average during the prior three-year period of approximately 98.9 million tons, a decrease of approximately 11%. This decrease was due primarily to a deterioration of general economic conditions and decreased demand for durable goods. For instance, the production of domestic cars and trucks in 1991 fell to 8.8 million units from an annual average during the prior three-year period of 10.6 million units. Consistent with these trends in the steel industry, the Company's raw steel production in 1991 fell to 2.5 million tons from an average of 2.9 million tons during the prior three-year period. Commencing in December 1991, the steel industry experienced a recovery in raw steel production and finished shipments. Production and shipments continued an upward trend through 1997. The industry's domestic raw steel production increased approximately 21% to approximately 106.7 million tons in 1997 from 87.9 million tons in 1991. Finished shipments increased over the same period to approximately 104.7 million tons from 78.9 million tons, an increase of approximately 33%. Given the inherent cyclicality of the domestic steel industry, the Company believes it is important to maintain financial

Management's Discussion and Analysis of Financial Condition and Results of Operations (continued)

flexibility in order to take advantage of opportunities to reduce costs and upgrade the quality and mix of its products. Rouge Industries believes that its strong balance sheet combined with its plan to reduce operating costs will position the Company to continue to pursue its business strategy throughout the economic cycle and to respond to the continually changing needs of its customers.

The following table summarizes the annual raw steel capacity, raw steel production, utilization rates and finished shipment information for the domestic steel industry (as reported by the American Iron and Steel Institute) and for Rouge Steel for the years from 1995 through 1997:

	Year	ar Ended December 31			
	1997	1996	1995		
	(in millions of tons except utilization)				
Domestic Industry					
Raw Steel Capacity	121.1	116.1	112.5		
Raw Steel Production	106.7	105.3	104.9		
Utilization	88.10%	90,70%	93.3%		
Finished Shipments	10- 1 .7	100.9	97.5		
Rouge Steel					
Raw Steel Capacity	3.1	3.0	3.0		
Raw Steel Production	2.8	2.6	2.0		
Utilization	91,200	84.3%	96,200		
Finished Shipments	3.0	2.9	2.5		

The cyclicality of the steel industry and the domestic economy affects the Company's steel product prices. To protect itself from the volatile nature of prices in the domestic steel industry, the Company sells approximately two thirds of its steel products pursuant to fixed price contracts, under which prices are typically set annually. In 1991, when domestic steel industry production and shipments were low, the Company's steel product prices reached a nine-year low. In 1993, prices began to rise and in 1994 they reached the highest level since 1988. By mid-1995, however, prices began to soften despite the continuing strong demand for the Company's products. During the second half of 1995, the Company lost approximately one half of the pricing gains which it realized in 1993 and 1994. Prices in 1996 made a modest recovery from late-1995 levels, but nevertheless remained lower than average 1995 prices. In 1997, prices declined slightly from 1996 levels despite strong demand for the Company's products.

Total Sales. The Company's total sales are a function of net tons shipped, praces and mix of products. The following table sets forth the percentage of the Company's steel product revenues represented by each of its product types for each of the years from 1005 through 1997:

	Year Ended December 31		
	1997	1996	1995
Hot Rolled	t ¹). †	F . F'	19.8%
Cold Rolled	29.8	30.0	28.4
Hot Dip Galvanized	0.6		_
Electrogalvanized	20,2	22.0	21.8
Total	100,000	[00,0%]	100.00

During periods of high demand, the Company ships all of the steel products it has the capacity to produce. For the past two years, when demand for the Company's products was high, the Company was able to supplement slabs produced internally with purchased slabs. The Company has been, and intends to continue, increasing its capacity so it will be positioned to take advantage of any increased demand with only a limited number of purchased slabs. In order to more fully utilize its hot strip mill and finishing facilities, the Company has been increasing its steel slab production capability. In 1996, Rouge Steel placed into service the third strand of its continuous caster, which allows the Company to continuously cast 400% of its liquid steel and eliminates the need to utilize the higher cost. lower quality ingot process. To maximize the continuous caster's capability, the Company further increased blast furnace efficiency and capacity by the addition of a new raw material handling system and the full reline of its smaller "B" blast furnace during 1997. The relines of "B" and "C" furnaces in 1997 and 1996, respectively, together with the addition of the raw material handling system, are expected to increase annual blast furnace capacity to approximately 3.0 million net tons or approximately 20% over the annualized second quarter 1996 level before any of these improvements were made. As a result of placing the third strand of the continuous caster into service and increasing blast furnace capacity, the Company believes that its steel slab production capacity will increase to approximately 3.4 million net tons annually.

In addition to increasing finished capacity, the Company intends to continue to improve product mix by increasing the capacity of its value-added facilities. For example, the expansion of Double Eagle in 1995 allowed Rouge Steel to increase shipments of value-added electrogalvanized steel products. Total shipments will not necessarily increase, but they are expected to include a higher proportion of value-added products. Likewise, the Company's expenditures on joint ventures will not necessarily allow total shipments to increase, but by permitting the Company to produce additional coated and blanked steel products, the joint ventures are expected to improve Rouge Industries' product mix.

Approximately two thirds of the Company's total sales are made pursuant to fixed price contracts primarily with automotive customers, under which prices are typically set annually. Sales to affiliates are comprised primarily of sales to Worthington, Rouge Industries' second largest customer and shareholder. Worthington owns approximately

Management's Discussion and Analysis of Financial Condition and Results of Operations continued)

27.3% of the Company's common stock which represents a voting interest of 19.9%.

Costs of Goods Sold. The principal elements constituting Rouge Industries' costs of goods sold are raw materials, labor and energy. Outside processing costs represent a growing element of the Company's costs of goods sold. The major raw materials and energy used by the Company in its production process are coke, iron ore pellets, steel scrap, natural gas, electricity, steam, oxygen and nitrogen. Coke, coal, iron ore pellets, electricity, steam, oxygen and nitrogen predominantly are purchased pursuant to long-term or annual agreements. The other raw materials are generally purchased in the open market from various sources and their availability and price are subject to market conditions.

Iron ore pellets are purchased from EVTAC pursuant to a six-year pellet purchase agreement. The Company's wholly-owned subsidiary, Eveleth, holds a 45% interest in EVTAC.

Rouge Steel's hourly production and maintenance employees are represented by the International Union, United Automobile, Aerospace and Argicultural Implement Workers of America, UAW and are working under a labor contract which expires on August 1, 2000. The collective bargaining agreement, which has a term of five years, contains no provision to renegotiate prior to its expiration.

Outside processing costs, which are principally costs for value-added processing that the Company cannot perform at Rouge Steel's integrated facility, have always been an element of the Company's costs of goods sold. The joint ventures involving Rouge Industries will increase the use of outside processing and related costs. However, Rouge Industries believes that the incremental revenue generated from additional sales of value-added products produced by the joint ventures will exceed such cost increases.

A large component of the Company's costs of goods sold in 1996 and 1997 was the purchase of steel slabs to augment its own production as a result of demand and blast furnace reline-related outages. In 1996, the Company purchased approximately 8-13,000 net tons of steel slabs, and during 1997, the Company purchased approximately 619,000 net tons of steel slabs. In 1998, assuming blast furnace production improves as anticipated, the Company plans to purchase only a limited number of steel slabs.

Results of Operations

Year Ended December 31, 1997 versus Year Ended December 31, 1996

Total Sales. Total sales increased 2.6% in 1997 to \$1,341.6 million from \$1,307.4 million in 1996, an increase of \$34.2 million. The increase in total sales was caused principally by higher shipments. Shipments increased 5.3% in 1997 to 3,029,000 net tons from 2,876,000 net tons in 1996, an increase of 153,000 net tons. Shipments were higher in 1997 because the Company was able to add new customers and increase sales to its existing customers. The Company purchased approximately

619,000 net tons of slabs in 1997 to augment its own production and accommodate the demand for its products. The higher revenue caused by increased shipments was partially offset by lower steel product selling prices. Total sales per net ton shipped decreased 2.6° in 1997 to \$443 from \$455 in 1996, a decrease of \$12 per ton.

Costs and Expenses. Total costs and expenses increased 2.1% in 1997 to \$1,309.9 million from \$1,282.7 million in 1996, an increase of \$27.2 million. Costs of goods sold increased 2.2% in 1997 to \$1,278.3 million from \$1,251.1 million in 1996, an increase of \$27.2 million. The increase in costs of goods sold can be attributed primarily to the 5.3% increase in shipments discussed above, higher purchased slab prices and increased project expense for blast furnace stove repairs, the takeover of Rouge Steel's internal railroad from Ford and demolition and site preparation expenses related to the new raw material handling system. Several factors partially offset the costs of goods sold increase; (i) noncapital expenditures associated with the reline of the smaller "B" blast furnace were lower in 1997 than non-capital expenditures associated with the reline of the "C" blast furnace in 1996, (ii) the "C" furnace performed more efficiently in post-reline 1997 than it did when it was nearing the end of its campaign in 1996, and (iii) the full-year effect of efficiencies gained from the launch in mid-1996 of the third caster strand which allowed the Company to eliminate the more costly ingot-slab process. Costs of goods sold was 95.3% of total sales in 1997, down slightly from 95.7% of total sales in 1996. Depreciation and amortization increased 19.2% in 1997 to \$15.6 million from \$13.1 million in 1996, an increase of \$2.5 million. The higher depreciation and amortization expense reflects the completion of major capital projects, primarily the full year effect of the third strand of the Company's continuous caster. Selling and administrative expenses decreased 10.6% in 1997 to \$21.8 million from \$24.3 million in 1996, a decrease of \$2.5 million. The decrease in selling and administrative expenses is primarily due to lower legal expenses and Michigan single business tax.

Operating Income. Primarily as a result of the efficiencies discussed above, including costs related to the "B" furnace reline, the improved productivity of "C" furnace and the full-year effect of the third strand of the caster, offset partially by lower steel product selling prices, operating income increased 28.3% in 1997 to \$31.7 million from \$24.7 million in 1996, an increase of \$7.0 million. Operating income represented 2.4% of total sales in 1997, up from 1.9% of total sales in 1996.

Interest Income. Interest income decreased 72.4% in 1997 to \$1.4 million from \$5.1 million in 1996, a decrease of \$3.7 million. The decrease in interest income was the result of a lower cash and marketable securities balance in 1997. The average cash and marketable securities balance in 1997 was \$20 million compared to \$86 million in 1996.

Equity in Income (Loss) of Unconsolidated Subsidiaries. Equity in loss of unconsolidated subsidiaries was \$718,000 in 1997 compared to equity in income of unconsolidated subsidiaries of \$50,000 in 1996. The loss in 1997 reflects the after-tax effect of Rouge Industries' share of losses incurred by Shiloh of Michigan and EVTAC as well as preproduction expenses recorded by Spartan Steel. The income in 1996 reflects the after-tax effect of the Company's share of Shiloh of Michigan's losses offset by one month's income generated by EVTAC.

Management's Discussion and Analysis of Financial Condition and Results of Operations (continued)

Year Ended December 31, 1996 versus Year Ended December 31, 1995

Total Sales. Total sales increased 8,4% in 1996 to \$1,307.4 million from \$1,206.6 million in 1995, an increase of \$100.8 million. The increase in total sales was caused principally by higher shipments. Shipments increased 13.4% in 1996 to 2.876,000 net tons from 2,542,000 net tons in 1995, an increase of 334,000 net tons. Shipments were higher in 1996 because the Company was able to add new customers and increase sales to its existing customers. Rouge Steel purchased 843,000 net tons of slabs in 1996 to augment its own production and accommodate the demand for its products. The effect of higher shipments on total sales was partially offset by lower steel prices in 1996. Total sales per net ton shipped decreased 4.2% in 1996 to \$455 from \$475 in 1995, a decrease of 820 per ton.

Costs and Expenses. Total costs and expenses increased 48.2% in 1996 to \$1,282.7 million from \$1,085.0 million in 1995, an increase of \$197.7 million. Costs of goods sold increased 15.6% in 1996 to \$1,251.1 million from \$1,082.1 million in 1995, an increase of \$169.0 million. The increase in costs of goods sold can be attributed primarily to four elements: (i) increased shipments of steel products, (ii) higher raw material, utility and labor costs, (iii) the blast furnace reline and other blast furnace problems, and (iv) the purchased slabs discussed above. In the first quarter of 1996, the larger of the Company's two operating blast furnaces, "C" furnace, experienced lining-related operating problems. A partial reline of "C" furnace was completed in the fourth quarter of 1996. The newlyrelined blast furnace experienced start-up problems which delayed production for several days and had a negative impact on the Company's results of operations. Costs of goods sold was 95.7% of total sales in 1996 compared to 89.7% of total sales in 1995. Depreciation and amortization increased 17.8% in 1996 to \$13.1 million from \$11.1 million in 1995, an increase of \$2.0 million. The higher depreciation and amortization expense reflects the completion of major capital projects, primarily the third strand of the Company's continuous caster. Selling and administrative expenses decreased 11.7% in 1996 to \$24.3 million from \$27.6 million in 1995, a decrease of \$3.3 million. The decrease in selling and administrative expenses is primarily due to three factors: (i) lower Michigan single business tax, which is a function of the Company's lower taxable income in 1996, (ii) lower profit sharing paid to the Company's administrative employees, which is also a function of the Company's lower taxable income, and (iii) less expense recorded for the development of the Company's customer order management system. In 1995, the Company reached an agreement with the City of Dearborn, the Dearborn Public School Board and the County of Wayne, Michigan which settled local property tax litigation for tax years 1990 through 1995. As a result of the settlement, the Company recorded a pretax benefit of \$30.0 million in 1995, net of profit sharing and inventory valuation costs.

Operating Income. Primarily as a result of the lower steel prices, the higher costs of goods sold discussed above, including costs related to the blast furnace outages and related production problems, and the absence of the property tax litigation settlement, which was recorded as a benefit in 1995, operating income decreased 79.7% in 1996 to \$24.7 million from \$121.6 million in 1995, a decrease of \$96.9 million. Operating income

represented 1.9° of total sales in 1996 compared to 10.1° of total sales in 1995. Excluding the impact of the property tax litigation settlement in 1995, operating income represented 7.6% of total sales. The margin deterioration in 1996 was attributable primarily to three factors: (i) higher raw material, utility and labor costs, (ii) the blast furnace outages and related blast furnace problems, and (iii) lower steel prices. Operating income per net ton shipped was \$9 in 1996 compared to \$48 in 1995.

Income Tax Provision. The income tax provision decreased 79.3% in 1996 to 86.9 million from 833.5 million in 1995, a decrease of 826.0 million. The lower income tax provision was a function of lower taxable income in 1996.

Minority Interest in Net Loss of Consolidated Subsidiary: Minority interest in net loss of consolidated subsidiary decreased in 1996 to \$37,000 from \$639,000 in 1995, a change of \$602,000. This change reflects lower costs resulting from increased rail shipments directly from Eveleth. Until November 30, 1996, Eveleth was 85% owned by the Company and 15% owned by Oglebay Norton Company ("Oglebay"). The minority interest reflects Oglebay's share of Eveleth's earnings or losses. Effective December 1, 1996, under the terms of a restructuring agreement, Eveleth became a wholly-owned subsidiary of the Company and, in exchange for a 45% ownership interest in EVTAC, Eveleth assigned substantially all of its operating assets and liabilities to EVTAC. In the future, the impact of the Company's ownership interest in EVTAC will be accounted for under the equity method and Rouge Industries' Consolidated Statements of Operations will not show any minority interest relating to EVTAC.

Equity in Income of Unconsolidated Subsidiaries. Equity in income of unconsolidated subsidiaries was \$50,000 in 1996 compared to \$0 in 1995. The amount in 1996 reflects the after-tax effect of the Company's share of Shiloh of Michigan's losses offset by one month's income generated by EVTAC. There was no income or loss from unconsolidated subsidiaries during 1995. The Company acquired its interest in Shiloh of Michigan during 1996 and, as previously discussed, treated Eveleth as a consolidated subsidiary until late 1996.

Net Income. Net income decreased 75.3% in 1996 to \$23.4 million from \$94.7 million in 1995, a decrease of \$71.3 million. The lower net income in 1996 reflects lower steel prices, higher costs of goods sold and the absence of the one-time property tax litigation settlement that was recorded in 1995, partially offset by a lower income tax provision.

Liquidity and Capital Resources

Rouge Industries' liquidity needs arise predominantly from capital investments and working capital requirements. The Company meets these liquidity needs primarily with cash provided by operating activities and funds provided by borrowings.

Cash, cash equivalents and marketable securities on December 31, 1997 totalled \$12.6 million compared to \$27.0 million on December 31, 1996, a decrease of \$14.4 million. This decrease was primarily due to cash used for capital spending and investments in unconsolidated subsidiaries.

Management's Discussion and Analysis of Financial Condition and Results of Operations (continued)

Cash Flows from Operating Activities. Net cash provided by operating activities increased in 199° to \$90.4 million from \$19.0 million in 1996, an increase of \$74.4 million. This increase is primarily the result of lower inventories. The decrease in inventories was primarily a result of a reduction of steel product inventories. Late in 199°, production was low due to the blast furnace outages and poor operating performance by "C" furnace. At the same time, the Company was shipping a high level of steel products. The combination of low production and high shipments caused the Company's inventories to decrease. Additionally, the Company had stockpiled slabs at December 31, 1996 in anticipation of the "B" blast furnace reline in 199°. Many of those slabs were used in 199° contributing further to the reduction in inventories.

Credit Facility: Rouge Steel has a five-year, \$100 million, unsecured revolving loan commitment under a credit agreement (the "Credit Agreement") among the Company, the banks named therein and NBD Bank, as administrative agent. The commitments of the lenders under the Credit Agreement expire on December 16, 2002. The revolving loans provided for under the Credit Agreement bear interest, at the option of the Company, at a rate equal to either (i) the base rate, which is the higher of the prime rate or the federal funds rate plus 0.5%, or (ii) the LIBOR rate plus an applicable margin, which varies with the Company's debt to capitalization ratio and can range from 0.20% to 0.40%. The Company had borrowings of \$17.9 million under the facility as of December 31, 1997. The Company believes that net income and funds available under the Credit Agreement will be adequate for its working capital and capital expenditure requirements.

Capital Expenditures. Cash used for capital expenditures, including investments in unconsolidated subsidiaries, increased 33.9% in 1997 to \$119.9 million from \$89.6 million in 1996, an increase of \$30.3 million. The most significant of the expenditures made in 1997 were for the completion of an automated raw material handling system and investment in Spartan Steel. Additionally, the Company incurred capital expenditures in 1997 for the full reline of its "B" blast furnace. The remaining expenditures were made primarily to upgrade and modernize the Company's steel processing facilities. During the five-year period commencing January 1, 1996, the Company anticipates spending approximately \$350 million on capital items and investment in unconsolidated subsidiaries, including \$101 million paid or accrued in 1996 and \$112 million paid or accrued in 1997. The planned capital expenditures are generally directed at improving and maintaining plant efficiency and quality to position the Company to improve its competitive position in the marketplace and, to a lesser extent, to enter into strategic joint ventures. In 1998, the Company plans to spend approximately \$50 million on capital items and investment in joint ventures including information systems upgrades and the completion of Spartan Steel. During 1998, the Company expects to invest approximately \$23 million in Spartan Steel, which is expected to be placed into service in mid-1998.

Waste Oxide Reclamation Facility Lease. Rouge Steel has committed to a seven year lease for a \$35 million waste oxide reclamation facility. The facility is presently being constructed, and it is expected to be completed in the third quarter of 1998. Lease payments will commence at that time.

Future Environmental Matters

The Company's operations are subject to many federal, state and local laws, regulations, permits and consent agreements relating to the protection of human health and the environment. The Company believes that its facilities are in material compliance with these laws and provisions and does not believe that liabilities arising out of existing environmental conditions or future compliance with environmental laws, regulations, permits and consent requirements will have a material adverse effect on its results of operations or financial condition. The Company has incurred capital expenditures in connection with matters relating to environmental control of approximately \$1.5 million during the past four years. In addition, the Company has planned approximately \$2.0 million in capital expenditures for environmental compliance for the years 1998 through 2001.

Ford has agreed to indemnify the Company (the "Ford Indemnity") for any liability arising out of an environmental condition existing prior to the Acquisition or a subsequent change in law relating to such condition which results in an environmental claim under any federal or state environmental law, including the Comprehensive Environmental Response Compensation and Liability Act of 1980, as amended, the Resource Conservation and Recovery Act, the Clean Water Act, the Safe Drinking Water Act, the Clean Air Act and the Occupational Safety and Health Act of 1970. The Ford Indemnity, which terminates on December 15, 2009, provides that Ford shall pay the Company's liabilities, including any penalties and attorney's fees, in connection with any environmental claim relating to pre-Acquisition conditions.

Since environmental laws and regulations are becoming increasingly more stringent, the Company's environmental capital expenditures and costs for environmental compliance may increase in the future. In addition, due to the possibility of unanticipated regulatory or other developments, the amount and timing of future environmental expenditures may vary substantially from those currently anticipated.

Year 2000 Compliance

The widespread use of computer programs that rely on two-digit date programs to perform computations and decision-making functions may cause computer systems to malfunction in the year 2000 which could lead to business delays and manufacturing disruptions. Rouge Industries has not completed its assessment of the extent of the year 2000 issue; however, management has determined that it will be required to modify or replace significant portions of its software so that its computer systems will property utilize dates beyond December 31, 1999. The Company has begun modifying and replacing its computer systems to address this issue and estimates that at least \$10 million will be spent to modify software and computer systems that are not year-2000 compliant.

Consolidated Balance Sheets

(amounts in thousands except share amounts)

	December 31	
Assets	199-	1996
Current Assets		
Cash and Cash Equivalents	\$ 12,570	8 24,914
Marketable Securities		2.039
Accounts Receivable		
Trade and Other (Net of Allowances of 86,333 and 87,294)	101,590	[112,593
Affiliates	9,876	0,005
Inventories	248,317	267.877
Other Current Assets	8,562	™.483
Total Current Assets	380,915	114,901
Property, Plant, and Equipment		
Buildings and Improvements	24,718	16.9±2
Machinery and Equipment	275,489	186,851
Construction in Progress	10,517	32.515
Subtotal	310,724	230,338
Less: Accumulated Depreciation	(42,162)	(21,176)
Net Property, Plant, and Equipment	268,562	209,162
Investment in Unconsolidated Subsidiaries	50,936	15,590
Deferred Charges and Other	28,096	42,300
Total Assets	\$ 728,509	\$ 681,953
Accounts Payable Trade	\$ 152,917	\$ 154,338
Affiliates	13,924	8,188
Accrued Vacation Pay	11,007	11,2±3
Taxes Other than Income	4,312	4,580
Other Accrued Liabilities	21,579	19,921
Total Current Liabilities	203,739	198,270
Long-Term Debt	17,900	
Other Liabilities	56,969	49,342
Excess of Net Assets Acquired Over Cost	11,280	070,71
Commitments and Contingencies (Note 12)		
Stockholders' Equity		
Common Stock		
Class A, 80,000,000 shares authorized with 14.428,219		
and 14,341,136 issued and outstanding as of		
December 31, 1997 and 1996, respectively	144	143
Class B, 8,690,400 shares authorized with 7,562,400		
issued and outstanding	7 6	76
Capital in Excess of Par Value	128,517	127,096
Retained Earnings	312,130	292,349
Additional Minimum Pension Liability Adjustment	(2,246)	(2,399)
Total Stockholders' Equity	438,621	+17,265
Total Liabilities and Stockholders' Equity	\$ 728,509	\$ 681,953

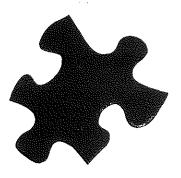
Consolidated Statements of Operations (amounts in thousands except share and per share amounts)

ecember 31

	Years Ended December 31		
	1997	[4)O(1	1995
Sales			
Unaffiliated Customers	\$ 1,158,218	\$ 1,125,722	8 1,019,914
Affiliates	183,342	181,6~6	186,652
Total Sales	1,341,560	1,307,398	1,206,566
Costs and Expenses			
Costs of Goods Sold	1,278,351	1,251,11+	1,082,0**
Depreciation and Amortization	15,563	13.056	11.083
Selling and Administrative Expenses Amortization of Excess of Net Assets	21,760	24,339	27,569
Acquired Over Cost	(5,796)	(5,796)	(5,796)
Property Tax Litigation Settlement (Note 11)			(29,9°±)
Total Costs and Expenses	1,309,878	1,282,713	1,084,959
Operating Income	31,682	2-1,685	121,607
Interest Income	1,418	5.136	5,739
Interest Expense	(630)	(329)	(326)
Other - Net	(1,244)	728	459
Income Before Income Taxes, Minority Interest and Equity in Income (Loss) of			
Unconsolidated Subsidiaries	31,226	30,220	127,479
Income Tax Provision	(8,094)	(6,915)	(33, 155)
Income Before Minority Interest and Equity in Income (Loss) of			
Unconsolidated Subsidiaries	23,132	23.305	94,024
Minority Interest in Consolidated Subsidiary			639
Equity in Income (Loss) of			
Unconsolidated Subsidiaries	(718)	5(1	
Net Income	<u>\$ 22,414</u>	s 23,392	\$ 94,663
Net Income Per Share - Basic and Diluted	\$ 1.02	S 1.07	S 4.37
Weighted-Average Shares Outstanding	21,938,743	21,844,864	21,677,435

Consolidated Statements of Changes in Stockholders' Equity (amounts in thousands)

		s Ended December 31	
Class A and Class B Common Stock	1997	199a	1995
Beginning Balance Common Stock Issued for Employee	\$ 219	\$ 218	8 216
Benefit Plans	1	1	'n
Ending Balance	220	219	218
Capital in Excess of Par Value			
Beginning Balance	127,096	124,246	120,212
Common Stock Assued for Employee Benefit Plans			
	1,405	2.811	3,955
Common Stock Issued for ODEP	16	39	-0
Ending Balance	128,517	127.096	124.240
Retained Earnings			
Beginning Balance	292,349	271,580	179,089
Net Income	22,414	23,392	94,663
Cash Dividends Declared	(2,633)	=	(2,172)
Ending Balance	312,130	292,349	271.580
Additional Minimum Pension Liability Adjustmen	+		
Beginning Balance	(2,399)	(2,190)	(3,806)
Required Minimum Liability Adjustment	153	(209)	1,616
Ending Balance	(2,246)		(2,190)
en e		V=322277	\=,1/0/
Total Stockholders' Equity	\$ 438,621	S 417,265	\$ 393,854



Consolidated Statements of Cash Flows (amounts in thousands)

	Years Ended December 31		
	1997	1996	1995
Cash Flows From Operating Activities			
Net Income	\$ 22,414	\$ 23,392	8 94,663
Adjustments to Reconcile Net Income to Net Cash			
Provided by Operating Activities:			
Deferred Taxes	9,540	+.+33	5.841
Depreciation and Amortization	15,563	13.056	11,083
Amortization of Capitalized Debt Costs	113	36	36
Equity in (Income) Loss of			
Unconsolidated Subsidiaries	718	(50)	_
Amortization of Excess of Net Assets			
Acquired Over Cost	(5,796)	(5,796)	(5,796)
Minority Interest in Consolidated Subsidiary	_	(37)	(639)
Common Stock Issued for Benefit Plans	1,422	2,851	-4,036
Changes in Assets and Liabilities:		·	
Accounts Receivable	(3,878)	3,692	9,437
Inventories	21,164	(42,802)	5,799
Prepaid Expenses	(47)	1,208	(7,252)
Accounts Payable and Accrued Liabilities	24,171	14,202	(14,124)
Restricted Cash			4,121
Other - Net	4	(182)	(96)
Gain on Property Tax Settlement			(29,974)
Proceeds from Property Tax Settlement	5,000	5.000	15,000
Net Cash Provided by Operating Activities	90,388	19,003	92,135
Cash Flows From Investing Activities			
Capital Expenditures	(82,359)	(80,339)	(65,797)
Purchase of Marketable Securities	(6,310)	(30,276)	(103,265)
Sale of Marketable Securities	8,349	71,561	78,886
Investment in Unconsolidated Subsidiaries	(37,538)	(9,222)	(3,629)
Other - Net	(142)	(229)	45
Net Cash Used for Investing Activities	(118,000)	(48,505)	(93,760)
Cash Flows From Financing Activities			
Drawdowns on Revolving Line	121,800		
Principal Payments on Revolving Line	(103,900)		
Cash Dividend Payments	(2,632)	(2,620)	(1,952)
Net Cash Provided by (Used for)			
Financing Activities	15,268	(2,620)	(1,952)
Net Decrease in Cash and Cash Equivalents	(12,344)	(32,122)	(3.577)
Cash and Cash Equivalents - Beginning of Year	24,914	57,036	60,613
Cash and Cash Equivalents - End of Year	\$ 12,570	\$ 24,914	\$ 57,036

O: WMD CC: RA RF

Complance file F MID 08773843/



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

JUL 0 8 1992

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR
June 25, 1992

Mr. Valdas Adamkus Regional Administrator U.S. EPA Region V 230 South Dearborn St. Chicago, IL 60604

Subject: Release to the Environment -

Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

JUL 8 1992

OFFICE OF SUPERFUND
ASSOCIATE
DIVISION DIRECTOR

The Rouge Steel Company reported a release to the environment of Spent Pickle Liquor. The attached incident report No. 88968 is being submitted as required by 40 CFR 265.56 (j).

Any questions you have regarding this incident should be directed to the Environmental Engineering Department at (313) 323-1260.

Very truly yours,

Manager Engineering and Environmental

RECEIVED

JUL 0 6 1992

U.S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

§40CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. L. N. Keeney 313-845-3217

§40CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of Waste Pickle Liquor (K062) ocurred on Wednsday, June 25, 1992, at 10:30 am because of a ruptured transfer line. A total of 4800 Gallons was contained in the storage tank containment area and 200 Gallons was released to the Schaefer Road waste Water Treatment Plant.

§40CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

Waste Pickle Liquor (K062) 5000 Gallons

§40CFR 265.56 (j) (5) EXTENT OF INJURIES

None

§40CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

There were no potential hazards.

§40CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Approxiamately 200 Gallons was Released to the Schaefer Road Waste Water Treatment Plant.

The remaining 4800 Gallons was pumped to the Waste Pickle Liquor Storage Tanks normally used to contain the material.

Prepared by:

John Bozick

11-9.d:

.RPT:910919



3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

February 24, 1992

Mr. Valdas Adamkus Regional Administrator U.S. EPA Region V 230 South Dearborn St. Chicago, IL 60604

Subject: Release to the Environment -

Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

The Rouge Steel Company reported a release to the environment of Mercury. The attached incident report No. 107061 is being submitted as required by 40 CFR 265.56 (j).

Any questions you have regarding this incident should be directed to the Environmental Engineering Department at (313) 323-1260.

Very truly yours,

L. N. Këeney,

Manager Engineering



OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

INCIDENT REPORT

§40CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. L. N. Keeney 313-845-3217

§40CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of Mercury occurred at 8:00 AM on February 17, 1992. The incident was reported to the National Response Center, Report No. 107061.

§40CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

The material released was liquid Mercury U151. The quantity was calculated to be approximately 2.5 pounds (RQ is 1 lb).

§40CFR 265.56 (j) (5) EXTENT OF INJURIES

No injuries occurred.

§40CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The material was spilled on concrete inside of the cold mill building in the storage area at the south end of the annealing isle. All material was contained and cleaned up promptly.

§40CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

All the material was recovered either through absorbents or by vacuuming up free material. Free material will be sent to a reclaim facility. All cleanup debris (Rags, Tyvecks, etc.) will be sent to a certified Hazardous waste disposal facility.

Prepared by:

J. F. Bozick





3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

September 23, 1991

Mr. Valdas Adamkus Regional Administrator U.S. EPA Region V 230 South Dearborn St. Chicago, IL 60604

Subject: Release to the Environment -

Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

The Rouge Steel Company reported a release to the environment of Spent Pickle Liquor. The attached incident report No. 88968 is being submitted as required by 40 CFR 265.56 (j).

Any questions you have regarding this incident should be directed to the Environmental Engineering Department at (313) 323-1260.

Very truly yours,

L. N. Keeney,

Manager Engineering

RECEIVED

SEP 2 5 1991

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR TOWN 8. JACOBS THO

INCIDENT REPORT

§40CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. L. N. Keeney 313-845-3217

§40CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of Waste Pickle Liquor (K062) occurred on Thursday, September 19 1991, at 6:30 am because of a ruptured transfer line. A total of 3700 Gallons was contained in the transfer piping trench and 1300 Gallons was transferred to the North Neutralizing tank.

§40CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

Waste Pickle Liquor (K062) 5000 Gallons

§40CFR 265.56 (j) (5) EXTENT OF INJURIES

None

§40CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

There were no potential hazards because all of the material was recovered or neutralized.

§40CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Approximately 1300 Gallons was transferred to the North Neutralizing tank where the PH was adjusted before being discharged to the sewer.

The remaining 3700 Gallons was pumped to the Waste Pickle Liquor Storage Tanks normally used to contain the material.

Prepared by:

John Bozick

ce: WMD ce: westlake RF



3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

July 16, 1991

Mr. Valdas Adamkus -Regional Administrator U.S. EPA Region V 230 South Dearborn St. Chicago, IL 60604

Subject: Release to the Environment -

Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

The Rouge Steel Company reported a release to the environment of Hydrochloric Acid. The attached incident report No. 79376 is being submitted as required by 40 CFR 265.56 (j).

Any questions you have regarding this incident should be directed to the Environmental Engineering Department at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manage)
Environmental Engineering

RECEIVED

JUL 18 1991

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

§40CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

§40CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of Hydrochloric Acid (HCl) occurred at 2:00 AM on July 14, 1991, at the company's No. 4 Pickle Line. The incident was reported to the National Response Center, Report No. 79376.

§40CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

The material released was Hydrochloric Acid. The quantity was calculated to be approximately 1663 pounds (RQ is 5000 lbs).

§40CFR 265.56 (j) (5) EXTENT OF INJURIES

No injuries occurred.

§40CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The material was discharged to the Schaefer Rd. Waste Water Treatment Plant (SRWWTP) and subsequently to the Rouge River through outfall 001A. Sodium Hydroxide was added to the discharge system at No. 4 Pickle Line to nuetralize the material. The release resulted in the discoloration of the Rouge River.

§40CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

There was no material recovered it is believed to have been chemically nuetralized.

Prepared by:

G. E. Waggoner



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

June 26, 1991

Mr. Valdas Adamkus Regional Administrator U.S. EPA, Region V 230 South Dearborn Street Chicago, IL 60604

SUBJECT: Release to the Environment - Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

On June 21, 1991, the Rouge Steel Company reported a release to the environment of Electric Arc Furnace Dust (KO61). The attached Incident Report No. 76484 is being submitted as required by 40 CFR 265.56 (j).

Any questions you may have regarding this incident should be directed to the Environmental Engineering Department at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager

Env. Engrg. Dept.

GD06-25.91/jm

RECEIVED

JUL 0 1 1991

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

§40CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

§40CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of Electric Arc Furnace Baghouse Dust occurred at 2:00 PM on June 21, 1991, from the baghouse. The incident was reported to the National Response Center at 3:55 PM on June 21, 1991, Report No. 76484.

§40CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

The material released was EAF Dust (K061). The quantity was approximately 7 cubic yards.

§40CFR 265.56 (j) (5) EXTENT OF INJURIES

No injuries occurred.

§40CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The material was confined to the immediate area until clean-up was complete.

11-9.d:EAFJUN91.RPT:910626

§40CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Total quantity recovered including slag and dirt from the ground, was 10 cubic yards. The material was picked up using a vacuum truck, and then transferred to the collection system dust storage silo for subsequent high temperature metals recovery treatment at Horsehead Resources, Inc. at Palmerton, Pennsylvania. Clean up was completed by 4:00 P.M. on june 25, 1991.

Prepared by:

G. E. Waggoner



3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

February 23, 1990

RECEIVED

FEB 2 8 1990

Mr. Valdas Adamkus Regional Administrator U.S. EPA, Region V 230 South Dearborn Street Chicago, Illinois 60604

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

SUBJECT: Release to the Environment - Rouge Steel Company,

MID 087738431

Dear Mr. Adamkus:

On February 15, 1990, the Rouge Steel Company reported a release to the environment of mercury (U151). The attached Incident Report No. 8531 is being submitted as required by 40 CFR 265.56 (j).

Please refer any questions to me at (313) 323-1260.

Very truly yours,

J. Doroshewitz, Manager Environmental Engrg. Dept.

ladam-sm

cc: D. Crosby

A. Apple

W. Hornberger

REGEIVED

MAR 1 1990

U. S. EPA, REGION V SWB — PMS

INCIDENT REPORT

40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building P.O. Box 1699 Dearborn, Michigan 48121-1699

40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz (313) 323-1260

40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of mercury (U151) occurred at our Hi-Line Instrument Shop on February 15, 1990. The time of the release is not known. The mercury was stored in a locker, in a glass container that was broken. The incident was reported to the National Response Center at 4:00 PM on February 15, 1990, Report #8531.

40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

The material released was mercury (U151). The quantity was approximate 1 pint.

40 CFR 265.56 (j) (5) EXTENT OF INJURIES

No injuries occurred.

40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The material was confined to the Instrument Repair Shop and adjacent lunchroom.

40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Total quantity recovered of mercury was one half pint, plus contaminated rags from the clean up were put in a 55 gallon drum for disposal. The clean up was completed by 12:15 PM on February 16, 1990.

MAR 1 1990

Prepared By: R. Dawson



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

May 15, 1989

0: WMD -CC: RF

Mr. Valdas Adamkus Regional Administrator U.S. EPA, Region V 230 South Dearborn Street Chicago, Illinois 60604

I-TSD-PART "A"
NO PART "B"

SUBJECT: Release to the Environment - Rouge Steel Company, MID 087738431

Dear Mr. Adamkus:

On May 14, 1989, Rouge Steel Company reported a release to the environment of Electric Arc Furnace dust (KO61). The attached Incident Report No. 7331 is being submitted as required by 40 CFR 265.56 (j).

Please refer any questions to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environ. Eng. Dept.

sm01-34

MAY 1 9 1989

U. S. EPA, REGION V SWB - PMS

RECEIVED

MAY 1 9 1989

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

A release of EAF dust (K061) occurred at 11:50 AM on May 13, 1989, from the Pneumatic Transport System. The incident was reported to the National Response Center at 9:15 AM on May 14, 1989, Report No. 7331, given to Mr. Bosley.

40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

The material released was EAF dust (KO61). The quantity was approximately 200 pounds (about three cubic feet).

40 CFR 265.56 (j) (5) EXTENT OF INJURIES

No injuries occurred.

40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The material was confined to the immediate area until cleanup was completed.

40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Total quantity recovered, including slag and other dirt from the ground, was 1000 pounds (one 55 gallon drum). The material was sent to Michigan Disposal, Inc. for treatment before being land filled at Wayne Disposal, Inc. Cleanup was completed by 4:10 PM on May 13, 1989.

890515

Prepared by: G. E. Waggoner

MICHIGAN DEPARTMENT OF NATURAL RESOURCES De -> E.PA?

INTEROFFICE COMMUNICATION

MID 027738 431

October 18, 1988

TO:

Joan Peck, Acting Chief, Land Application Unit

FROM:

Jan Sealock, Hazardous Waste Permits Jon Sealock

SUBJECT: Rouge Steel Company

I have reviewed the sampling protocol incorporated by Rouge Steel Company, Dearborn, Michigan. After examining the material submitted, some questions arose regarding the waste streams and lab analytical results. It was determined that more information needs to be provided concerning both of these areas.

A letter submitted by Levy Taylor Landfill on July 27, 1988, contained information pertaining to Rouge Steel Company's waste streams. After reviewing each waste stream a question arose regarding the determination that some samples were representative and/or homogeneous. To get a better background for such determinations, more sampling events need to be conducted within a shorter time span. Three of the waste piles had two different sampling results. This was a good start, but some of the analyses dated back to 1980, 1982, and 1984 which is a large span of time to compare results acquired in 1988. To determine if the samples are truly homogeneous and representative, a minimum of four samples should be obtained within a year's time or more background data needs to be presented.

The power house fly ash is not considered exempt from inert as opposed to hazardous status under R299.9204. The geographical location from which the coal was collected is an important factor to determine what elements are presented within the coal. Once again more sampling results from the waste pile would be helpful to determine the coal's content for heterogeneous or homogeneous properties.

The detailed EPA method that Rouge Steel Company incorporated to collect the electrostatic precipitator dust was good until the samples were brought to SSECO lab and all five samples were combined into one "master" sample. All five samples need to be tested separately to get a better representation of the waste pile. Combining all five samples into one and aliquoting this into five replicates is a more accurate determination of the lab's quality assurance/quality control instead of the homogeneity of the waste pile. Another question was asked regarding why zinc was the only element analyzed for exceedence of the regulatory threshold.

October 18, 1988

A question also came to mind after looking on page 3 of the March 17th, 1988 lab analytical results from Ford's Central Laboratory. Sample #4 documents that it contains D/S baghouse and BOF/KISH. This does not correspond with the first page of the investigation report which has BOF/KISH crossed out for sample #4 as it was received. The exact content of this sample needs to be provided.

Lastly, a set of analytical data provided by CLOW Hydro Research Services dated April 14, 1981 does not identify the samples by any name or identification, only lab results are included. It looked as though the samples' identifications were crossed out. It should be more clearly outlined as to their identification.

Please let me know if you have any questions regarding this review.

cc: Ms. D. Montgemery, WMD 🗸

INTEROFFICE COMMUNICATION

December 20, 1988

TO:

Joan Peck, Acting Chief, Land Application Unit

FROM:

Jan Sealock, Hazardous Waste Permits 5.5.

SUBJECT: Rouge Steel Company

I have reviewed the additional material presented and material submitted in the past by Rouge Steel Company, Dearborn, Michigan. After looking over all of the material it was determined that more samples need to be obtained for each waste characterization. Some questions also arose regarding other topics from the information provided.

All wastes excluding the blast filter cake and blast furnace debris had at least one sample for lab analysis. There were no analyses provided for these two samples. Analyses should also be performed for these two wastes. In order to give wastes a homogeneous designation as was given by Rouge Steel, at least four samples must be obtained and analyzed within a 1-year time span. If results from the analyses determine homogeneity with no variance, a single sample would then be justified. Some of the wastes listed do contain more than one lab analysis. These analyses, however, were dated some time apart thus giving less representation of the variability of the wastes. By increasing the samples taken from a population an increase in sampling accuracy also is obtained. All wastes should then have four samples obtained and analyzed. A description of how the samples were collected needs to also be provided indicating that a true representative sample was obtained.

Some other areas of concern arose regarding the information supplied. Once again it should be reemphasized that the power house fly ash is not considered exempt from inert as opposed to hazardous status. The electrostatic precipitator dust should not be combined into one composite from 5 different waste piles. Instead each sample from separate piles should be ran for analysis. Combining the five samples at the lab gives a more accurate determination of the lab's precision and accuracy. Keeping the five samples separate for analysis gives a better representation of the waste pile and provides proof that it is average properties of the whole waste. One of the waste, BOF debris, was listed under the waste description list but was not documented as a waste under the basic oxygen furnace. More information needs to be provided for this waste.

Please let me know if you have any questions regarding this review.

cc: Ms. D. Montgomery, WMD 🥒

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

De -> E.PA?

October 18, 1988

TO:

Joan Peck, Acting Chief, Land Application Unit

FROM:

Jan Sealock, Hazardous Waste Permits Jan Sealock

SUBJECT: Rouge Steel Company

I have reviewed the sampling protocol incorporated by Rouge Steel Company, Dearborn, Michigan. After examining the material submitted, some questions arose regarding the waste streams and lab analytical results. It was determined that more information needs to be provided concerning both of these areas.

A letter submitted by Levy Taylor Landfill on July 27, 1988, contained information pertaining to Rouge Steel Company's waste streams. After reviewing each waste stream a question arose regarding the determination that some samples were representative and/or homogeneous. To get a better background for such determinations, more sampling events need to be conducted within a shorter time span. Three of the waste piles had two different sampling results. This was a good start, but some of the analyses dated back to 1980, 1982, and 1984 which is a large span of time to compare results acquired in 1988. To determine if the samples are truly homogeneous and representative, a minimum of four samples should be obtained within a year's time or more background data needs to be presented.

The power house fly ash is not considered exempt from inert as opposed to hazardous status under R299.9204. The geographical location from which the coal was collected is an important factor to determine what elements are presented within the coal. Once again more sampling results from the waste pile would be helpful to determine the coal's content for heterogeneous or homogeneous properties.

The detailed EPA method that Rouge Steel Company incorporated to collect the electrostatic precipitator dust was good until the samples were brought to SSECO lab and all five samples were combined into one "master" sample. All five samples need to be tested separately to get a better representation of the waste pile. Combining all five samples into one and aliquoting this into five replicates is a more accurate determination of the lab's quality assurance/quality control instead of the homogeneity of the waste pile. Another question was asked regarding why zinc was the only element analyzed for exceedence of the regulatory threshold.

October 18, 1988

A question also came to mind after looking on page 3 of the March 17th, 1988 lab analytical results from Ford's Central Laboratory. Sample #4 documents that it contains D/S baghouse and BOF/KISH. This does not correspond with the first page of the investigation report which has BOF/KISH crossed out for sample #4 as it was received. The exact content of this sample needs to be provided.

Lastly, a set of analytical data provided by CLOW Hydro Research Services dated April 14, 1981 does not identify the samples by any name or identification, only lab results are included. It looked as though the samples' identifications were crossed out. It should be more clearly outlined as to their identification.

Please let me know if you have any questions regarding this review.

cc: Ms. D. Montgomery, WMD



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

September 2, 1988

Mr. Valdas Adamkus Regional Administrator U. S. EPA Region V Federal Building 230 S. Dearborn Street Chicago, Illinois 60604

Dear Mr. Adamkus:

Subject: Release to the Environment-

Rouge Steel Company, MID 087738431

Reference: 40 CFR 265.56 (j)

Report Number NRC 11815

RECEIVED
SEP 0 8 1988

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

On August 25, 1988, Rouge Steel Company reported a release to the environment of electric arc furnace baghouse dust (K061). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

Attachment

SEP 07 1988

AIR AND RADIATION DIVISION U.S. EPA, REGION M

ROUGE STEEL COMPANY INCIDENT REPORT

§40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121 Contact: Mr. G. Doroshewitz 313-323-1260

§40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Release of Electric Arc Furnace baghouse dust (K061) at 1830 hours on 8-25-88 from the dust storage silo.

- §40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED EAF baghouse dust (K061); estimated to be 50 pounds.
- §40 CFR 265.56 (j) (5) EXTENT OF INJURIES
 No injuries.
- §40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The released material was contained on-site; there is no hazard to human health or the environment. The release area was secured to prevent access until clean up crews arrived. Clean up was initiated and completed promptly. Only licensed contractors were used on the clean up.

§40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Approximately one cubic yard of material was sent to Michigan Disposal, Inc. for treatment and disposal. This volume of material included all the released dust and some ground materials (slag, stone, and soil).

Prepared by: G. E. Waggoner

11-9:EAFAUG01.RPT:September 2, 1988 REPORT: NRC 11815

77 WMD



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

O: ARD

July 22, 1988

Mr. Valdas Adamkus Regional Administrator U. S. EPA Region V Federal Building 230 S. Dearborn Street Chicago, Illinois 60604

Dear Mr. Adamkus:

Subject: Release to the Environment-

Rouge Steel Company, MID 087738431

Reference: 40 CFR 265.56 (j)

On July 20, 1988, Rouge Steel Company reported a release to the environment of electric arc furnace baghouse dust (K061). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

Attachment

RECEIVED

JUL 27 1988

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

§40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

- §40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT Between midnight and 6:30 a.m. on 7-20-88 EAF baghouse dust was released to the ground. Clean-up began at 6:30 a.m. and was completed by 10:00 a.m.
 - §40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED Approximately 3000 # of EAF baghouse dust (K061).
 - §40 CFR 265.56 (j) (5) EXTENT OF INJURIES There were no injuries.
- §40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

 There are no known hazards to human health or the environment.
 - §40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL
- 2 cu.yds. of material were vacuumed up and taken to a hazardous waste disposal facility (Michigan Disposal Inc.). This included some dirt vacuumed up along with the dust.

Prepared by: W. A. Gaines



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

O: ARD

AWM

July 18, 1988

Mr. Valdas Adamkus Regional Administrator U. S. EPA Region V Federal Building 230 S. Dearborn Street Chicago, Illinois 60604

Dear Mr. Adamkus:

Subject: Release to the Environment-

Rouge Steel Company, MID 087738431

Reference: 40 CFR 265.56 (j)

On July 10, 1988, Rouge Steel Company reported a release to the environment of electric arc furnace baghouse dust (K061). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

Attachment

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11-9.d:EAFJUL01.LTR:880718

JUL 27 1988

OFFICE OF REGION 5

INCIDENT REPORT

§40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

§40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Release of Electric Arc Furnace baghouse dust (K061) at 2150 hours on 7-10-88 from the pneumatic transport system.

- §40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

 EAF baghouse dust (K061); estimated to be 5800 pounds.
- §40 CFR 265.56 (j) (5) EXTENT OF INJURIES
 No injuries.
- §40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

The released material was contained on-site; there is no hazard to human health or the environment. The release area was secured to prevent access until clean up crews arrived. Clean up was initiated and completed promptly. Only licensed contractors were used on the clean up.

§40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

Eight cubic yards of material was sent to Michigan Disposal, Inc. for treatment and disposal. This volume of material included all the released dust and some ground materials (slag, stone, and soil).

Prepared by:

G. E. Waggoner

11-9.d:EAFJUL01.RPT:880718

INCIDENT REPORT

§40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building PO Box 1699 Dearborn, Michigan 48121-1699

§40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company 3001 Miller Road Dearborn, Michigan 48121

Contact: Mr. G. Doroshewitz 313-323-1260

§40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Tuesday, May 24, 1988
Between 1:00 AM and 7:00 AM
Release of Baghouse Dust (K061)

§40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

Approximately 6500 pounds of K061 was released from the dust silo when the upper level limit failed.

§40 CFR 265.56 (j) (5) EXTENT OF INJURIES

There were no injuries during this incident.

§40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

This material was released to the air, but investigation of the area indicates that airborne transportation was limited. No impact to human health or the environment resulted from this incident.

§40 CFR 265.56 (j) (7) QUANTITY AND DISPOSITION OF RECOVERED MATERIAL

The released material was collected by scraping the surface of the affected area and vacuuming the accumulated material. Approximately 20,000 pounds of K061 and surface material was transported to a hazardous waste landfill for disposal.

Prepared by:

John Condo



O: ARD

3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

June 21, 1988

Mr. Valdas Adamkus Regional Administrator U. S. EPA Region V Federal Building 230 S. Dearborn Street Chicago, Illinois 60604

Dear Mr. Adamkus:

Subject: Release to the Environment-

Rouge Steel Company, MID 087738431

Reference: 40 CFR 265.56 (j)

On May 24, 1988, Rouge Steel Company reported a release to the environment of electric arc furnace baghouse dust (K061). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

Attachment

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JUN 2 4 1988

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

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JUN 27 1988

AIR AND RADIATION DIVISION U.S. EPA, REGION V

ROUGE STEEL COMPANY

Mr. Valdas V. Adamkus

Regional Administrator United States Environmental

Chicago, Illinois 60604

9 Wasth of Divi

3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

December 9, 1987

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DEC 1 4 1987

Dear Mr. Adamkus:

Protection Agency

Federal Building 230 S. Dearborn

Subject:

Region V

SWB , REGION V

15 Day Letter, Release to the Environment - Rouge Steel Co., MID 087738431 (15 D

Reference:

40 CFR 265.56 (j)

On December 7, 1987, Rouge Steel Company reported a release to the environment of electric furnace baghouse dust (KO61). The attached Incident Report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions you may have to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

attachment

cc: J. W. Grindrod

H. G. McIlnay

C. H. Porter (SSECO)

R. C. Toth

H. I. Weinberg

INCIDENT REPORT

40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building 3001 Miller Road Dearborn, Michigan 48121

40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company
Electric Arc Furnace
3001 Miller Road
Dearborn, Michigan 48121
Contact: Mr. G. Doroshewitz
(313) 323-1260

40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Monday, December 7, 1987 Between 1:00 a.m. and 7:55 a.m. Release of Baghouse Dust

40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

About 75 pounds of Electric Furnace baghouse dust was inadvertently released from the No. 4 compartment rotary lock when the seal failed.

40 CFR 265.56 (j) (5) EXTENT OF INJURIES

The release did not involve any injuries.

40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

This release did not affect surface or ground water, air, or soil. It did not result in a hazard to human health or the environment.

40 Cfr 265.56 (j) (7) QUANTITY AND DESCRIPTION OF RECEIVED MATERIAL

The released material was recovered by vacuum truck. Released material and incidental surface material picked up by the truck was transported to a hazardous waste landfill for disposal.

Prepared by:

R. C. Toth

Environmental Engineer





U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR 3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

July 23, 1987

JUL 2 9 1987

U. S. EPA, REGION V

O. WMD CC: RF

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental
Protection Agency
Region V
Federal Building
230 S. Dearborn
Chicago, Illinois 60604

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1111 2 7 1987

U. S. EPA R. OF DECIDENCE ADMINISTRA

Dear Mr. Adamkus:

Subject:

15 Day Letter, Release to the Environment

Reference:

40 CFR 265.56 (j)

On July 10, 1987 Rouge Steel Company reported a release to the environment of electric furnace baghouse dust (K061). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions you may have to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz, Manager Environmental Engineering

Attachment

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JIIL 27 1987

SOLIU WASTE EMANICH U.S. EPA, REGION V

gd23,7/7/87

INCIDENT REPORT

40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company MID 087738431 2110 Rouge Office Building 3001 Miller Road Dearborn, Michigan 48121

40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company
Electric Arc Furnace
3001 Miller Road
Dearborn, Michigan 48121
Contact: Mr. G. Doroshewitz
313) 323-1260

40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Wednesday, July 10, 1987 between 4:00 AM and 4:30 AM Release of Baghouse Dust

40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

Approximately 4 cubic yards of electric furnace baghouse dust was inadvertently released from the pneumatic dust transport system. The surge hopper level indicator failed and allowed the screw conveyor system to overfill the surge hopper and force the screw conveyor cover open.

40 CFR 265.56 (i) (5) EXTENT OF INJURIES

The release did not involve any injuries.

40 CFR 265.56 (i) (6) ACTUAL AND POTENTIAL HAZARDS

This release did not affect surface or ground water, air, or soil. It did not result in a hazard to human health or the environment.

40 CFR 265.56 (j) (7) QUANTITY AND DESCRIPTION OF RECEIVED MATERIAL

The released material was recovered by vacuum truck. Released material and incidental surface material picked up by the truck was transported to a hazardous waste landfill for disposal.

Prepared by:

J.M. Forrester

Sr. Environmental Engineer



REGEIVED

3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

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July 1, 1987

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
Region V
Federal Building
230 S. Dearborn
Chicago, Illinois 60604

Dear Mr. Adamkus:

Subject: 15 Day Letter, Release to the Environment Reference: 40 CFR 265.56 (j)

On June 17, 1987 Rouge Steel Company reported a release to the environment of electric furnace baghouse dust (KO61). The attached incident report is being submitted as required by the referenced section of the Code of Federal Regulations.

Please refer any questions you may have to me at (313) 323-1260.

Very truly yours,

G. Doroshewitz

Manager, Environmental

Engineering

O. WMD CC: RF

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JUL 0 8 1987

U. S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR

INCIDENT REPORT

40 CFR 265.56 (j) (1) OWNER

Rouge Steel Company 2110 Rouge Office Building 3001 Miller Road Dearborn, Michigan 48121

40 CFR 265.56 (j) (2) LOCATION OF INCIDENT

Rouge Steel Company
Electric Arc Furnace
3001 Miller Road
Dearborn, Michigan 48121
Contact: Mr. G. Doroshewitz
(313) 323-1260

40 CFR 265.56 (j) (3) DATE, TIME, AND TYPE OF INCIDENT

Wednesday, June 17, 1987 between 12:00 AM and 2:00 AM Release of Baghouse Dust

40 CFR 265.56 (j) (4) MATERIAL AND QUANTITY INVOLVED

Approximately 2 cubic yards of electric furnace baghouse dust was inadvertently released from the pneumatic dust transport system during maintenance. The cause of the release was a missed communication between maintenance employees of two different shifts.

40 CFR 265.56 (j) (5) EXTENT OF INJURIES

The release did not involve any injuries.

40 CFR 265.56 (j) (6) ACTUAL AND POTENTIAL HAZARDS

This release did not affect surface or ground water, air, or soil. It did not result in a hazard to human health or the environment.

40 CFR 265.56 (j) (7) QUANTITY AND DESCRIPTION OF RECEIVED MATERIAL

The released material was recovered by vacuum truck. Released material and incidental surface material picked up by the truck was transported to a hazardous waste landfill for disposal.

Prepared by:

S. L. Landes, Environmental Engineer

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
ERRY KAMMER
J. STEWART MYERS
DAVID D. OLSON
RAYMOND FOUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

David F. Hales, Director

S.E. MICHIGAN FIELD OFFICE Waste Management Division 505 W. Main Northville, MI 48167

September 29, 1988

Mr. Gerald Dorshewitz Rouge Steel Co. 3001 Miller Rd. Dearborn, MI 48121

RE: MID 087738431

Dear Mr. Dorshewitz,

On September 21, 1988, an inspection was conducted at your facility located at 3001 Miller Road, Dearborn, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement:

- 1. As discussed, the hazardous waste tanks associated with the coke oven process are no longer being used. The process equipment, shut down in April, remain intact. The liquid waste has been removed from the tanks, though unpumpable sludge remains. Holding this waste beyond the 90 day limit constitutes storage. Since the tanks are not covered under interim status or permit, storage in the tanks must be eliminated immediately. R306(3)
- 2. In response to our conversation on spill notification, the Department PEAS system must be notified of any spill which has contacted air, water or soil and may cause harm to health and/or environment. In further conversation with Wayne County Air staff, they shared our concerns and agreed that they should

H1026-1

Page 2, 9-29-88 Rouge Steel Dearborn, MI RE: MID 087738431

have been contacted during the July releases of K061 waste. Since the contingency plan doesn't clearly specify the above, it must be amended to include the following:

Wayne County Air, 274-3366 (for release to the air).
MDNR Surface Water, 344-9460 (for releases to surface waters).
MDNR Environmental Response, 344-9440 (for releases to soil and/or ground waters).
MDNR PEAS Hotline, 1-800-292-4706 (for calls other than normal business hours).

In addition, since Michigan's now an authorized state, the Michigan staff will be responding to spill notifications on behalf of EPA. R306(1d), 265.51(a), 265.54.

In addition, you are requested to correlate between the pounds of release K061 and cubic yards of recovered material noted in spill reports to demonstrate adequate cleanup.

- 3. According to your inspection log, a shipment of solvent wastes (F-series) was shipped off-site between August 5 and 12, 1988. No manifest could be found for the shipment. Verification that required land disposal restriction notification was included with the manifest could not be found. R307(3) and 268.7.
- Manifests must include the document number R304(2a).
- 5. Company failed to send MDNR white copies as directed.

The following additional areas were discussed, recommendations and appropriate actions noted.

 Manifests in the Hiline shipping office were not being matched to assure proper disposal. This is a requirement for Act 64 manifests and should be adopted for Act 136 manifests to assure that any 64 manifests are properly matched and assure that the companys wastes are received by appropriate facilities thus lessening the company's liabilities. Page 3, 9-29-88 Rouge Steel Dearborn, MI RE: MID 087738431

- 2. In accordance with 306(1a) and 264.175(b1), the containment base must be "sufficiently impervious". You are requested to demonstrate that your drum containment pad meets the requirements.
- 3. With the closure of the hazardous waste storage unit and UIC well, you have stated that Rouge Steel will be operating as a generator only. A renotification needs to be submitted to correct and update the original notification to US EPA, Region V.

We request your response by October 20, 1988 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Lynne King

Environmental Quality Analyst

Enclosure

LK:bs

cc: B. Okwumabua

U.S. EPA, Region V



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

March 31, 1988

William E. Muno, Chief RCRA Enforcement Branch U. S. EPA Region V 230 S. Dearborn Street Chicago, Illinois 60604 Attn: 5HE-12

Dear Mr. Muno:

Subject: Consent Order and Final Agreement

Docket Number V-W-86-R-61

Reference: Telephone conversation, L. Lodisio and

S. L. Landes, 3/23/88

Letter, W. E. Muno to H. I. Weinberg, 3/16/88

In the referenced letter you requested information documenting the actual training of the Company employees named in our list of <u>Job Classifications Included in Training</u>. Mr. Landes of our Environmental Engineering Department discussed this request with Ms. Lodisio today. They agreed that we would provide dates when the last annual training was performed so that the annual training provision could be audited.

The training was last performed on the following dates:

December 9, 10 1987 and February 2, 4, 23, and 24, 1988

Consequently, the next annual training will be performed before December 9, 1988.

The Attachment A to our letter of March 4, 1988 has been revised to include these dates in the Training Certification statement (attached).

H. I. Weinberg Vice President

Facilities and Engineering

Attachment: 2 pages

CAFOFU.LTR:11-9:880229

Hazardous Waste Management duties, Responsibilities, and Functions Job Classifications Included in Training

Job Classification

President

VP Employee Relations

VP Engineering & Facilities

VP Operations

Mgr Mfg & Environmental Engrg Mgr Environmental Engineering

Sr. Environmental Engineer

Sr. Environmental Engineer

Sr. Environmental Engineer

Environmental Engineer

Environmental Engineer Environmental Engineer

Manager Primary Operations

Supt Electric Arc Furnace &

Slabbing Mill

Supt Melting Maintenance

Manager Finishing Operations

Supt Hot Mills Supt Cold Mills

Mqr Hourly Personnel and

Labor Relations

Sec Supv Industrial Safety

and Fire Protection

Safety Engineer Senior

Safety Engineer Senior

Safety Engineer Senior

Mgr Power Operations Utility

Supt Power Production

Supt Maintenance

Supt Marine Operations

Environmental Coordinators:

Basic Oxygen Furnace

Blast Furnace

Coke Ovens

Cold Mill

Electric Arc Furnace

Hot Strip Mill

Power House

Roll Shop

Slab Mill

Continuous Caster

Employee

D. E. Blackwell

W. E. Hornberger

H. I. Weinberg

R. D. Way

J. W. Grindrod

G. Doroshewitz

J. M. Forrester

W. A. Gaines

G. E. Waggoner

R. J. Dawson

S. L. Landes

R. C. Toth

H. B. Patterson

R. Wahl

M. Seitz

G. P. Schneider

E. M. Sikina

R. Harpster

B. L. McDougall

R. J. Sayre

J. Esper

J. A. Oszvart

J. J. Smiley

T. W. Katofiasc

S. Rosa

R. A. Stopper

J. R. Comerford

R. Klaes

R. Rankin

T. Barstow

D. Swabon

R. Kelly

G. Pendolino

(same as Supt Power Prod)

D. Morosi

E. Jordan

S. Feldhak

SHIPPING AND RECEIVING

Hi Line (Blast Furnace/ Coke Ovens

Coke (same Oven as Environmental Coordinator)

Basic Oxygen Furnace A46 (Finished Handling) W. McCormick M. Mikonczyk

POWER SERVICE OPERATORS Electric Arc Furnace Baghouse

- D. Brown
- J. Hamlet
- R. Campbell R. Nesmith
- J. Dolkowski

I certify that the above named Rouge Steel Company personnel were trained by me in the administration and implementation of the Rouge Steel Company Hazardous Waste Contingency Plan for 1987/1988. The above listed personnel were trained in sessions given on December 9 and 10, 1987 and February 2, 4, 23, and 24, 1988.

S. L. Landes

Environmental Engineer

H.I. Weinberg, Vice-President Engineering and Facilities Rouge Steel Company P.O. Box 1699 Dearborn, Michigan 48121-1699

> Re: Consent Agreement and Final Order Docket No: V-W-86-R-61

Dear Mr. Weinberg:

This is to acknowledge receipt of your letter of March 4, 1988, in response to my letter of February 5, 1988, requesting documentation of compliance to the personnel training requirements of the Resource Conservation and Recovery Act (RCRA). This documentation is required to demonstrate compliance to the above referenced Consent Agreement and Final Order.

Though your submittal includes lists of employees, job titles, job descriptions and a brief outline of your training program, there is no documentation that the training, as well as annual review, was ever actually implemented. Please forward records which provide documentation that the appropriate personnel have taken part in the training, as well as annual reviews.

It is required that you respond to the above no later than 15 days after receipt of this letter. If you have questions, please contact Laura Lodisio of my staff at (312) 886-7090.

Sincerely yours,

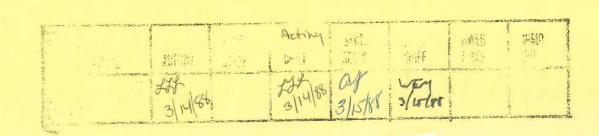
ORIGINAL SIGNED BY WILLIAM F. MUNO

William E. Muno, Chief RCRA Enforcement Branch

cc: Larry AuBuchon, MDNR, Northville

bcc: Roger Grimes, ORC

LLODISIO:slowery: Disk VII: 3-10-88







3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

March 4, 1988

William E. Muno, Chief RCRA Enforcement Branch U. S. EPA Region V 230 S. Dearborn Street Chicago, Illinois 60604 Attn: 5HE-12

Dear Mr. Muno:

Subject: Consent Order and Final Agreement

Docket Number V-W-86-R-61

Reference: Letter, 2/5/88, W. E. Muno to H. I. Weinberg

The original response date requested in the referenced letter was changed to March 4, 1988 by mutual agreement in a telephone conversation between L. Lodisio of Region V and G. E. Waggoner of Rouge Steel on February 25, 1988.

The Rouge Steel Hazardous Waste Training Program was revised during 1987 due to a reorganization of business at Rouge Steel Company and hazardous waste minimization efforts. Specifically, during 1987 Rouge Steel's coke making operation permanently ceased operation. In addition, a waste stream was eliminated because it is now an effective substitute for a commercial product. As a result of these changes many of the people trained in 1986 no longer work with hazardous waste and were not subsequently trained in 1987.

In response to the referenced letter, enclosed are copies of a list of job titles and names of personnel working with hazardous waste management (attachment A), a written description of duties, responsibilities, and functions of the various categories of personnel which may be involved in hazardous waste management (attachment B), and our current training program (attachment C).

William E. Muno, Chief RCRA Enforcement Branch U. S. EPA, Region V Re: Docket Number V-W-86-R-61

No minimum prerequisites regarding academic credentials, skills or qualifications are maintained/specified by Rouge Steel Company as part of its hiring practices. We are providing documentation that appropriate personnel were trained in 1987 (attachment A).

The attached documents should be a complete response to the requests in the referenced letter.

Very truly yours,

H. I. Weinberg / Vice President

Facilities and Engineering

Attachments: (3)

- A) Job Classifications and Names of Personnel Included in Training
- B) Hazardous Waste Management Duties, Responsibilities, and Functions
- C) Hazardous Waste Training Program description

Hazardous Waste Management duties, Responsibilities, and Functions Job Classifications Included in Training

Job Classification

President

VP Employee Relations

VP Engineering & Facilities

VP Operations

Mgr Mfg & Environmental Engrg Mgr Environmental Engineering

Sr. Environmental Engineer

Sr. Environmental Engineer

Sr. Environmental Engineer

Sr. Environmental Engineer

Environmental Engineer

Environmental Engineer

Environmental Engineer

Manager Primary Operations

Supt Electric Arc Furnace &

Slabbing Mill

Supt Melting Maintenance

Manager Finishing Operations

Supt Hot Mills

Supt Cold Mills

Mgr Hourly Personnel and

Labor Relations

Sec Supv Industrial Safety

and Fire Protection

Safety Engineer Senior

Safety Engineer Senior

Safety Engineer Senior

Mgr Power Operations &

Utility

Supt Power Production

Supt Maintenance

Supt Marine Operations

Environmental Coordinators:

Basic Oxygen Furnace

Blast Furnace

Coke Ovens

Cold Mill

Electric Arc Furnace

Hot Strip Mill

Power House

Roll Shop

Slab Mill

Continuous Caster

Employee

D. E. Blackwell

W. E. Hornberger

H. I. Weinberg

R. D. Way

J. W. Grindrod

G. Doroshewitz

J. M. Forrester

W. A. Gaines

G. E. Waggoner

R. J. Dawson

S. L. Landes

R. C. Toth

H. B. Patterson

R. Wahl

M. Seitz

G. P. Schneider

E. M. Sikina

R. Harpster

B. L. McDougall

R. J. Sayre

J. Esper

J. A. Oszvart

J. J. Smiley

T. W. Katofiasc

S. Rosa

R. A. Stopper

J. R. Comerford

R. Klaes

R. Rankin

T. Barstow

D. Swabon

R. Kelly

G. Pendolino

(same as Supt Power Prod)

D. Morosi

E. Jordan

S. Feldhak

CONPLN.MNL:11-9:880224

SHIPPING AND RECEIVING

Hi Line (Blast Furnace/ Coke Ovens

Coke (same Oven as Environmental Coordinator)

Basic Oxygen Furnace A46 (Finished Handling) W. McCormick M. Mikonczyk

POWER SERVICE OPERATORS

Electric Arc Furnace Baghouse

- D. Brown J. Hamlet
- R. Campbell R. Nesmith J. Dolkowski

I certify that the above named Rouge Steel Company personnel were trained by me in the administration and implementation of the Rouge Steel Company Hazardous Waste Contingency Plan for 1987/1988.

Environmental Engineer

HAZARDOUS WASTE MANAGEMENT DUTIES, RESPONSIBILITIES, AND FUNCTIONS

ROUGE STEEL COMPANY U.S. EPA FACILITY ID NO. MID 087738431

RE: U.S. EPA RCRA Regulations, 40 CFR 265.16(d)

Duties, responsibilities and functions of Rouge Steel Company employes who are involved in hazardous waste management activities at the Rouge facility include the following:

- Packaging including the placement of hazardous wastes in containers, tanks, etc. from individual processes which generate hazardous waste. These activities are ordinarily performed at the source or at the hazardous waste storage/marshalling area.
- Labeling including affixing EPA required labels on each container as hazardous waste is placed inside, recording the date on the label when accumulation begins, etc. These activities are ordinarily performed at the source or at the hazardous waste storage/marshalling/transfer area.
- Loading/Transportation including the pumping out of sumps, tanks and inprocess equipment into waste storage tanks, containers and/or vendorsupplied tank trucks for off-site disposal. Also includes the movement of containers, portable tanks, etc. by fork truck, tug, scrubmobile, dolly or similar vehicle to the hazardous waste storage/marshalling area and/or vendor-supplied vehicle for off-site disposal.
- Manifests/Tracking/Exception Reporting including completion of each hazardous waste manifest prior to shipment indicating EPA waste code, quantity, TSDF and transporter ID numbers, etc. submittal of required documents to appropriate regulatory agencies, manifest tracking/follow-up and exception reporting in cases where return loop manifest copies are not returned within the 35 and 45 days specified by EPA.
- . <u>Shipping</u> including specifying DOT shipping information, hazard class, etc., as well as preparation of Rouge Steel Shipper and related documentation.
- Surveillance, Inspections, and Spill Response as outlined in the plant's PIPP/SPCC Plan. Activities include periodic field inspections of discharge outfalls and hazardous waste storage areas, surveillance and documentation, follow-up repairs and maintenance, emergency spill containment, and notification and response if the PIPP/SPCC Plan were to be activated.

The above hazardous waste duties, responsibilities and functions are performed by a variety of plant personnel in the course of routine plant operations. Job classifications of employes whose responsibilities include hazardous waste management activities are the following:

gd20,4/6/87

Rev: Date: Page:

ROUGE STEEL COMPANY HAZARDOUS WASTE PLAN TRAINING PROGRAM

Annual hazardous waste management training is required for all Rouge Steel employees who:

- . Handle hazardous waste
- . May handle hazardous waste
- . Supervise hazardous waste handlers
- . Bear responsibility for compliance with Hazardous Waste Regulations

Training is intended to comply with 40 CFR 262.34 (a) 4, 40 CFR 265 Parts C and D, and 40 CFR 265.16

Employees requiring annual training receive one hour of classroom training and general hazardous waste management and a handout with information specific to wastes encountered by each employee.

Classroom training is developed and conducted by Rouge Steel Environmental Control personnel. The Training Program includes:

- . General environmental awareness
- . Company commitment to compliance
- . General hazard information and precautions
- . Specific information on handling each waste in emergency situations.

It is the intent of Rouge Steel Company to provide more than the functional training required by regulation. The training should acquaint Rouge Steel employees with the connection between complying with regulations and the quality of their lives at work and at home. Compliance will be most readily and consistently achieved when all employees understand that compliance is in the best interests of the Company and its employees.

Employees newly assigned to one of the classifications listed on Page 60.2 receive immediate training from Supervision and, if necessary, one-on-one training from an Environmental Engineer.

s122,7/24/86-24

FEB 0 5 1988

H.I. Weinberg, Vice-President Engineering and Facilities Rouge Steel Company P.O. Box 1699 Dearborn, Michigan 48121-1699

> Re: Consent Agreement and Final Order Docket No: Y-M-86-R-61

Dear Mr. Weinberg:

This is to acknowledge receipt of your letter of January 18, 1988, regarding actions taken to comply with the above-referenced Consent Agreement and Final Order.

Please be advised that the copies of personnel training records submitted to document compliance to the requirements of the Michigan Administrative Code 1985 AACS R299.9306 and R299.11003(1)(m) and 40 CFR 265.16(d) are not considered adequate. Though you submitted the sign-in sheets showing who attended various training sections, the documentation did not include the following required information:

- a) Job titles and the names of employees filling each job.
- A written job description including the requisite skill, education or other qualifications and duties assigned to each position.
- c) A written description of the type and amount of both introductory and continuing training that will be given to and completed by each person.

Second, the sign-in sheets indicate that a number of personnel received training in December 1986. Please document that these personnel have taken part in an annual review of training since that time.

It is required that you respond providing the above information no later than 15 days after receipt of this letter. If you have questions, please call Ms.

of at (312) 886-7090. Your cooperation in resolving

Laura Los,
this Los,
Sin Le Mino, Chief
RCRA Enforcement Branch

cc: Larry AuBuchon, MDNR, Morthville

Dcc: Roger Grimes, ORC LLODISIO:slowery-2-2-88

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

		: •)		
IN THE MATTER OF)	DOCKET NO.	RCRA-V-W-86-R-61
ROUGE STEEL COMPAN	Υ.,			
	RESPONDENT			
)		

ORDER TO FILE

IT IS ORDERED THAT Roger Grimes , EPA Counsel in the above-styled case bearing said Docket Number, shall report the status hereof within seven working days following the date hereof advising:

- 1. Whether all issues in the above case have been resolved;
- 2. Whether a Consent Agreement has been prepared and, if so, the location of same;
- 3. Any performance anticipated with respect to said CAFO and by whom, as a means of effecting formal disposition, and
- 4. The date, firm and definite, when a CAFO will be finalized and an executed copy forwarded to the undersigned.

If your response to the above is negative, you are Ordered to so advise by return mail whereupon the requested hearing and a date for filing or updating the prehearing exchange will be scheduled so that all outstanding issues raised by the pleadings can be resolved by the hearing requested herein.

SO ORDERED.

DATE: January 20, 1988

Marvin E. Jones

Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the Original of the foregoing ORDER TO FILE was mailed via Certified Mail, Return Receipt Requested, to

Ms. Beverely Shorty (5MFA-14)
Regional Hearing Clerk
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604;

that a True and Correct Copy was mailed in the same manner and to the same address to Counsel for Complainant, Roger Grimes

and that a True and Correct Copy was mailed in the same manner to Counsel for Respondent:

Peter J. Sherry, Jr., Esquire Rouge Steel Company The American Road Room 556, WHQ Dearborn, Michigan 48121;

all such service effected this 20th day of January , 1988.

Mary Lou Clifton

Secretary to Marvin E. Jones, ADLJ

many Low Clifton



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

January 18, 1988

Waste Management Division U. S. EPA Region V 230 S. Dearborn Street Chicago, Illinois 60604

Attention: Ms. Laura Lodisio

. RCRA Enforcement Section

RECEIVED

Dear Ms. Lodisio:

Subject: Consent Agreement and Final Order

Docket Number V-W-86-R-61

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

As agreed to in the Consent Agreement and Final Order, the Rouge Steel Company is hereby transmitting specified information and certifications regarding compliance with applicable RCRA regulations.

This package completes the submittal of required documentation under the CAFO. The other remaining action, payment of the civil penalty, will be handled separately.

Very truly yours,

H. I. Weinberg

Vice-President, Engineering

and Facilities

Rouge Steel Company Environmental Engineering Consent Agreement and Final Order Docket Number V-W-86-R-61

Rouge Steel Company (respondent) provides the following information and certifications in accordance with the Consent Agreement and Final Order settling the allegations in docket number V-W-86-R-61.

- A2) The Verification of Clean Up plan approved by the Michigan Department of Natural Resources has been implemented and successfully completed. No detectable residuals associated with past operations have been found in the area in question. This information has been supplied to the Michigan Department of Natural Resources. A copy is attached (Attachment 1).
- B1) Waste characterizations have been performed on all solid waste streams generated at the Rouge Steel Company facility. A summary sheet of these waste streams and the basis for determining the nature of each waste is attached (Attachment 2). Note that tar decanter sludge and deepwell filtration media are not on this summary sheet. After the inspection of March 1986, manufacturing processes were changed so that these materials were returned to the original processes from which they were generated (per 40 CFR 261.2 (e) (1) (iii)); thus eliminating them as solid wastes. Therefore, there has been no tar decanter sludge or deepwell filter media solid waste to characterize since March 1986. The manufacturing process which produced these materials was discontinued on April 21, 1987.
- B2) Appropriate signs have been posted at all hazardous waste storage areas.
- B3) The tar decanter sludge handling process was completely changed so as to return the sludge to the original process from which it was generated. The manufacturing process which generated the sludge has since been permanently discontinued. Actions have been taken to clean up the alleged tar sludge spill.
- B4) Copies of employee training session sign in sheets for 1986, which constitute our records that appropriate persons were trained according to applicable RCRA regulations, are attached (attachment 3).

Attachment 1 Rouge Steel Company Verification of Clean Up Docket V-W-86-R-61

(2 sheets)



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

January 18, 1988

Mr. James D. Roberts Waste Management Division Michigan Department of Natural Resources P. O. Box 30028 Lansing, Michigan 48909

Dear Mr. Roberts:

Subject: Rouge Steel Company
Verification of Clean Up

Reference: RCRA Complaint Y-W-86-R-61

We have performed the verification of clean up described in our letter to you of July 10, 1987. As was agreed upon by both parties, we collected eight core samples of the concrete pad underlying the area where coke oven tar decanter sludge was formerly handled. The cores were prepared and analyzed by Burmah Technical Services of Pontiac, Michigan. EPA SW 846 "Test Methods for Evaluating Solid Waste" procedures were used. The samples were analyzed for total naphthalene, phenol, and cyanide.

Results of the analyses are attached. The data show that there is no detectable concentration of any of the test parameters in any of the core samples. According to the Verification of Clean Up plan approved by the Waste Management Division, a successful clean up would be defined as "the data for each parameter from the background being within three standard deviations of the mean of the data for that parameter from the area". Since the data from all samples for all parameters is below detection limits it is reasonable to conclude that a successful clean up has been performed.

Subject to the disclaimer in Mr. Howard's letter of September 23, 1987, this letter to you should complete the actions required of Rouge Steel Company in this matter.

Very truly yours,

G. Doroshewitz

Manager, Environmental

Engineering

cc: L. Lodisio, U. S. EPA Region V

D. Drake, MDNR

VERCOMP:11-9:sysdate

December 4, 1987

Ford Motor Company Rouge Steel 2110 Rouge Office Bldg. 3001 Miller Road Dearborn, MI 48121-1699 Attn: Steve Landes

PROGRAM: CONCRETE SAMPLES

Samples Received: 11-9-87

Sample Numbers: Client I. D.:	29979 #1	29980 #2	29981 #3	29982 #4	29983 #5	29984 #6	29985 #7	29986 #8
Cyanide, CN, mg/kg	<1	<1	<1	<1	<1	<1	<1	<1
Phenol, mg/kg	<10	<10	<10	<10	<10	<10	<10	<10
Naphthalene, mg/kg	<10	<10	⟨10	<10	<10	(10	<10	∢10

Methodology:

Cyanide	EPA	9010
Phenol	EPA	8040
Naphthalene	EPA	8100

Concrete/1c

Docket V-W-86-R-61

ROUGE STEEL COMPANY RCRA WASTE CHARACTERIZATION SUMMARY SHEET

WASTE STREAM	STORAGE METHOD	STORAGE LOCATION		CERTIFICATION REASON	RECERTIF. REASON	HAZ. WASTE #
ASBESTOS	BAGS & BOXES	SUB 15	NO	REGULATION	REGULATION	N/A
BELT CAKE	20 YD BOX	S.END CASTER	NO	ANALYSIS	ENGR, KNOWL.	N/A
BF SLAG	OUTSIDE PIT		NO	ANALYSIS	ENGR.KNOWL.	N/A
BOF SLAG	OUTSIDE PILE		NO	ANALYSIS	ENGR.KNOWL.	N/A
BOTTOM ASH	SILO	POWER HOUSE	NO	ENGR.KNOWL.		N/A
COARSE DUST	SILO	W.SIDE BOF	NO	ANALYSIS	ANALYSIS	N/A
D/S DUST	BOXES	N.SIDE BOF	NO	ANALYSIS	ENGR.KNOWL.	N/A
EAF DUST	SILO	S. SIDE EAF	YES	ANALYSIS	LISTED	K061
EAF SLAG	OUTSIDE PILE	EAF	NO	ANALYSIS	ENGR.KNOWL.	N/A
FILTER CAKE	OUTSIDE PIT	S. OF BFWW	NO	ANALYSIS	ENGR.KNOWL.	N/A
FINE DUST	SILO	W. SIDE BOF	NO	ANALYSIS	ENGR.KNOWL.	N/A
FLUE DUST	DUST CATCHER	BLAST FCES.	NO	ANALYSIS	ENGR.KNOWL.	N/A
FLY ASH	HOPPER	POWER HOUSE	NO	ANALYSIS	ENGR.KNOWL.	N/A
GREASE	DRUMS	SATELITE	NO	ANALYSIS	ANALYSIS	N/A
HSM SCALE	SCALE PIT	N.END HSM	NO	ANALYSIS	ENGR.KNOWL.	N/A
J-9 SLUDGE	BOX	J-9 SHOPS	NO	ANALYSIS	ENGR.KNOWL.	N/A
KISH	HOPPERS	N.SIDE BOF	NO	ANALYSIS	ENGR.KNOWL.	N/A
LIME DUST	HOPPERS	E.SIDE BOF	NO	ENGR.KNOWL.		N/A
LIME SLUDGE	STEEL TANK	POWER HOUSE	NO	ENGR.KNOWL.	N/A	N/A
METHYLENE CH	DRUMS	OXYGEN PLANT	YES	LISTED	LISTED	F002
MILL SCALE	SCALE PIT		NO	ANALYSIS	ENGR.KNOWL.	N/A
MILL SCALE 2	SCALE PIT	S.END CASTER	NO	ENGR.KNOWL.	ENGR.KNOWL.	N/A
MINERAL SP 1	DRUMS	SUB-15	YES	LISTED	LISTED	D001
MINERAL SP 2		AT USE AREAS	YES	LISTED	LISTED	D001
P.C. REFUGE	OUTSIDE PILE	S.SIDE P.C.	NO	ENGR.KNOWL.		N/A
PALLETS	VARIOUS	VARIOUS	NO	ENGR.KNOWL.	ENGR.KNOWL.	N/A
PICKLE LIQ.	3 40000 G TA		NO	ANALYSIS	ENGR.KNOWL.	к062
RS DUST	SILO	ROLL SHOP	NO	ENGR.KNOWL.	N/A	N/A
SCARFER GRIT	SCALE PIT	S.END SLAB M		ANALYSIS	ENGR.KNOWL.	N/A
SOAK PIT DEB	ON FLOOR	SM BASEMENT	NO	ANALYSIS	ENGR KNOWL.	N/A
UNCOMP.TRASH	BOXES	"PIG PEN"	NO	ENGR.KNOWL.	ENGR.KNOWL.	N/A
USED OIL	DRUMS	SATELITE	NO	ANALYSIS	ANALYSIS	N/A
WASTE OIL	TANK	PICKLE LINES	NO	ANALYSIS	ANALYSIS	N/A
WASTE OIL 2 WASTE OIL 3	TANK	TANDEM MILL Z-46	NO NO	ANALYSIS ANALYSIS	ANALYSIS ANALYSIS	N/A N/A
WASTE OIL 4 WASTE OIL 5	STEEL TANK STEEL TANK	S.END SLAB M W.SIDE HSM	NO NO	ANALYSIS ANALYSIS	ANALYSIS ANALYSIS	N/A N/A
WASTE OIL 5	TANK	W.SIDE HSM	NO	ANALYSIS		N/A N/A
WASTE OIL 6	UNDERG. TANK	SUB-15	NO NO	ANALYSIS	ANALYSIS ANALYSIS	N/A N/A
WASTE OIL / WASTE OIL 8	STEEL TANK	W.SIDE HILO	NO	ANALYSIS	ANALYSIS	N/A N/A
WASTE OIL 8	STEEL TANKS	SRWF	NO	ANALYSIS	ANALYSIS	N/A N/A
111 TRICHLOR	SAFETY-KLEEN	SUB-15	YES	LISTED	LISTED	F002
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Attachment 3 Rouge Steel Company Training Records Docket V-W-86-R-61

(40 sheets)

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Date 12-11-81 Time. 1000 AM



RCRA

ATTENDANCE ROSTER

		Print	
DEPARTMENT	SIGNATURE	NAME /	SOCIAL SECURITY NO.
1714	Dentita	D.H. D. HMAR	378-44-2363
1731	BRUNSON	BRONJON	370-34-1559
1131	Art. Ecche	Ecoles	364-13-1234
1731	R. Kaiser	KAISO-R	375 38 9681
1731	Bulanan	H.D. BUCHANAN SE	408-60-3483
731	Charles Rusking	CHAILLES A RUSHING	409-48-7134
1731	anthony Felice	ANTHONY JELICE	366-32-9732
1731	2 WABONO	EMMANUEL DEBONG	381-344719
1711	Michael Robbe	Michael Rohde	362-58 6475 L
1731	Soff Leon	JOE Leon	372-36-1787
1131	George Williams	George K. Williams	369-40-1621
1711		en JAMESMPATZ	01374-30-66%
1731	DongBall	DON J. Bell	379-38-8006
1711	Tela Soute	n LILA DOUTIN	V382-44-8571
17/2	Juline Ageland	PAULINE ROLAND	370348749
1712	Singe M Deir	SIADE DEIN	384-44-5503
1700	they scarled	Kathy Scanon	384-44-6154
1731	Bill Manny	BILL MANNY	363-36-7863
:14	Cal 7 Ballet	CARL F. BOLDT	V366385026
1714	D. n. Krawcke	GERALD KRAWCKE	V 367-30-4112

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Fired Computation and Sketch Pad

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Date 10-11-87 Time 600 PM

DEPARTMENT 1714 AD 113 AD 118 1711	SKNATURE John Button Joseman Maen	Print NAME J. G. KATONA J. Bot Zon F. D. CLARK ROSEMARY MARON	SOCIAL SECURITY NO. 200-24-4662 382-46-6700 376-52-9435 373-42-756

ROUGE AREA
HAZARDOUS TRAINING



Date 12/11/86

		Print	1/m2 - 1- An
DEPARIMENT	SIGNATURE	NAME	SOCIAL SECURITY NO.
1712	Edward alabarts	EDWARD ALSOBROCKS	363-46-3921
1711	John Amil	JOHN SHIDH	377-50-1265
173/	Dave Merrye	DAVE METNZINGER	362-48-9384V
1760	LL Camillain	E.L. CAMILLERI	386-32-7184
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DATE 12-16-86

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1792	9142	Robert C BAKER	Robert C. Baker
1722	3257	RALAH CUNNINGHAM	Repl Comylin
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1722	3170	LARRY McCLAID	Tarry Mckpin
1722	6252	FRANK MORELLI	Grank morelli
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Training Program
Sign-In Sheet
(Please initial after
your name)

MEETING NOTICE

DATE:

FEBRUARY 10, 1987

TIME:

2:00 p.m. - 3:30 p.m.

LOCATION:

Conference Room 2007 ROB

SUBJECT:

Hazardous Waste Contingency Plan Training

Attendees:

D. E. Blackwell

G. Doroshewitz

G. P. Schneider

J. R. Gilson

W. W. Smith

J. W. Grindrod

H. I. Weinberg

M. P. Wojtowicz

Agenda:

Distribution of controlled copies of Hazardous 10 min Landes Waste Contingency Plan

2. Training Session

60 min Landes/Dawson

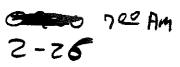
3. Questions

20 min Landes/Dawson

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

JAN 08 1988

Honorable Thomas B. Yost Administrative Law Judge Environmental Protection Agency 345 Courtland Street Atlanta, GA 30365

RE: Rouge Steel Company

Docket No. RCRA-V-W-86-R-61

Dear Judge Yost:

This is to transmit to you a copy of the settlement document that has resolved the above-cited matter.

As always, please call with any questions at (312) 886-6595.

Sincerely yours,

Roger Grimes

Assistant Regional Counsel

cc: Peter J. Sherry, Jr.
Rouge Steel Company
3001 Miller Road
P.O. Box 1699

Dearborn, MI 48121-1699

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

DEC 2 9 1387

REPLY TO THE ATTENTION OF: 5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter J. Sherry, Esquire Ford Motor Company The American Road, 556/WHQ Dearborn, Michigan 48121

Re: Consent Agreement and
Final Order
Rouge Steel Company
Dearborn, Michigan
Docket Number V-W-86-R-61

Dear Mr. Sherry:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by Rouge Steel Company. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

William H. Miner, Acting Chief

Solid Waste Branch

Enclosure

cc: Dennis Drake, MDNR, Lansing Larry AuBuchon, MDNR, Northville

NNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

IN THE MATTER OF:

ROUGE STEEL COMPANY 3001 MILLER ROAD DEARRORN, MICHIGAN 48121-1699

EPA I.D. No.: MID 087 738 431

DOCKET NO. V-M-86-R-61

CONSENT AGREEMENT AND FINAL ORDER OF

PREAMBLE

On July 22, 1986, a Complaint was filed in this matter pursuant conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Pevocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (N.S. EPA). The Respondent is Rouge Steel Company, 3001 Miller Road, Dearborn, Michigan.

STIPULATIONS

The parties desiring to settle this action, enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Compliance Order (Docket No. V-W-86-R-61) in this matter.
- 2. Respondent is a Delaware Corporation whose registered agent in Michigan is the secretary, Ford Motor Company, The American Road, Dearborn, Michigan 48121. Respondent owns and operates a facility located at 3001 Miller Rd., Dearborn, Michigan 49504 (the "facility").
 - 3. Respondent admits the jurisdictional allegations contained in the Complaint.

- 4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint, and by agreeing to this Consent Agreement and Final Order (CAFO), Pespondent makes no admission regarding the regulatory status of its decanter tank tar sludge handling facilities.
- 5. Pespondent explicitly waives its right to request a hearing on the allegations contained in the Complaint.
- 6. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated.
- 7. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. EPA, pursuant to Section 3006(b) of RCPA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program.
- 8. This CAFO shall become effective on the date it is signed by the Regional Administrator.

FINAL ORDER

Rased on the foregoing stipulations, the parties agree to the entry of the following Final Order:

A. Respondent shall, immediately upon this Order becoming final, cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste treatment, storage, and disposal facilities, Michigan Administrative Code 1985 AACS Part 6, except as provided for in Paragraph 1 and 2 below.

- 1. Respondent has submitted for approval a plan to the Michigan Department of Natural Resources (MDNP) regarding the hazardous waste (decanter tank tar sludge) handling area. MDNR has reviewed the plan in accordance with the requirements of Michigan Administrative Code 1985 AACS, R299.11003, Rule 1003(1)(m) which adopts by reference 40 CFP 265 Subpart G. By letter dated September 23, 1987, MDNR approved the plan of which copies are attached hereto, as Attachment A.
- Respondent shall implement the approved plan specified in Paragraph A(1) above, in accordance with all schedules and conditions contained in the plan.
- R. Respondent shall, immediately upon this Order becoming final, achieve and maintain compliance with the standards applicable to generators of hazardous waste Michigan Administrative Code 1985 AACS Part 3 except as provided below.

Within 15 days of this Order becoming final, Respondent shall provide U.S. FPA and MDNR with the following:

- Nocumentation that waste characterization has been conducted on all solid wastes generated at the facility, pursuant to the requirements of the Michigan Administrative Code 1985 AACS R299.9302.
- 2. A statement that the appropriate signs have been posted at all hazardous waste storage areas pursuant to the requirements of the Michigan Administrative Code 1985

AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.14(c).

- 3. A statement that the decanter tar sludge handling operation is maintained and operated to minimize the possibility of a fire, explosion, or any sudden or nonsudden release of hazardous waste or waste constituents to air, soil or surface water which could threaten human health and environment and that remedial action has been taken to clean up the spill of decanter tar sludge alleged in the complaint pursuant to the Michigan Administrative Code 1985 AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.31.
- 4. Copies of personnel training records which document compliance to the requirements of the Michigan Administrative Code

 1985 AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.16(d).
- C. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Laura Lodisio RCRA Enforcement Section.
- D. A copy of any documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Dennis Drake, Chief, Compliance Section, Hazardous Waste Division, Michigan Department of Natural Resources, P.O. 30028, Lansing, Michigan 48909.

F. Respondent shall pay a civil penalty in the amount of TWENTY-SIX THOUSAND FIVE HUNDRED (\$26,500) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Rox 70753, Chicago, Illnois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5C-16), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

The H.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of the Treasury pursuant to 31 H.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

This Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinhefore recited.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 II.S.C. §6973, or other statutory authority should the II.S. EPA determine that the handling of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of the Michigan Administrative Code 1985 AACS R299.9101 through R299.11104, inclusive; 40 CFR Part 124 and 270; and this Order. U.S. EPA also expressly reserves any right it may have, to take any action necessary under 3008(h) of RCRA requiring corrective action at the facility.

SIGNATORIES

Each undersigned representative of a party to this Consent Agreement and Final Order consisting of 6 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

Agreed this	_ day of	DEC	9 1987	, 1987.
Ry J. A. Courter Pouge Steel Company James A. Respondent Assistant	Courter Secretary	_		
Agreed this 24^{2}	_ day of	Ducer	me	, 1987.
Waste Management Division Complainant U.S. Environmental Protection Ag Region V	gency			
The above being agreed and cons	ented to,	, it is s	so Ordered	

1987.

- Malda M

Valdas V. Adamkus/ Regional Administrator

U.S. Environmental Protection Agency

Region V

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STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
THOMAS J ANDERSON
MARLENE J FLUHARTY
KERRY KAMMER
D STC 18T MYERS
DAV DLSON
RAYM...D POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING BOX 30028 LANSING, MI 48909

GORDON E GUYER, Director

RAL RESUBUILDING

Director

September 23, 1987

Mr. G. Doroschewitz, Manager Environmental Engineering Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, Michigan 48121-1699

Dear Mr. Doroschewitz:

The Michigan Department of Natural Resources has reviewed your revised Verification of Cleanup for a coke breeze/tar sludge treatment area. The Verification of Cleanup was submitted as a result of a U.S. EPA enforcement action, complaint number Y-W-86-R-61. The revisions you have made adequately address the deficiencies noted in our June 9, 1987 letter. The Verification of Cleanup was reviewed in accordance with Michigan Administration Code R 299.91003, which adopts 40 CFR 265 Subpart G by reference, and is hereby approved.

As discussed with you and representatives from your company, the closure and cleanup of this area does not relieve you from any future action which may be required under the corrective action provisions of the Hazardous and Solid Waste Amendments of 1984.

If you have any questions concerning this matter, please contact Mr. James D. Roberts of this Division at 517-373-7718.

Sincerely,

Alan J. Howard, Chief Waste Management Division

Lames Til Ducker

517-373-2730

cc: Mr. Richard Traub, EPA

Ms. Mary Murphy, EPA

Ms. Laura Lodisio, EPA

Mr. Ken Burda/C&E File

Mr. Larry Aubuchan

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February 26, 1987 Revised: July 10, 1987

Verification of Clean-up (All Wastes Removed)

Owner:

Rouge Steel Company 3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121

EPA I. D. NO.:

MID 087738431

Facility Contact:

G. Doroshewitz

Manager, Environmental

Engineering Department

(313) 323-1260

I. GENERAL INFORMATION - FACILITY CONDITIONS

A. Facility size - Approximately 30' x 30' with coke breeze walls approximately 3' high.

B. Facility volume - Approximately 70 cubic yards to contain waste material.

C. Waste Characterization - The facility was used to contain coke oven decanter tar sludge, EPA Hazardous Waste No. K087.

II. REMOVAL OF ALL INVENTORY

A. Volume of material removed (including waste and debris) - Approximately 200 cubic yards (fourteen truck loads).

B. The coke breeze walls and coke oven decanter tar sludge were removed to the underlying concrete. The coke breeze walls and tar decanter sludge were loaded with a front end loader and placed into 14 cubic yard dump trucks for transport to the Wayne Disposal, Inc. hazardous waste landfill in Belleville, Michigan (EPA ID No. MID 048090633). The material removed was described as "Hazardous waste sludge, N. O. S." and identified as "Waste No. K087" on the waste manifests accompanying each load.

III. DECONTAMINATING THE FACILITY

A. The coke oven decanter tar sludge and the surrounding coke breeze walls were removed to the underlying concrete surface. The concrete surface overlays the foundation for a series of coke ovens

which were demolished in the mid-1930's. A description of the area is included as attachment I. Over the years the area was used for various purposes but mainly as a field storage pad for coal and coke breeze. The dimensions of the coke oven foundation are approximately 827' x 70' and it is believed to be on a concrete mat base from 2' to 4' thick.

- B. Criteria for determining contamination
- 1. Four core samples will be taken from the concrete surface in the low area within the tar decanter sludge area (see drawing 87-CO-5, sheet lattached). The sample locations will be determined using the USEPA "Field Manual For Grid Sampling Of PCB Spill Sites To Verify Cleanup" (EPA-560/5-86-017, May 1986). Rouge Site coordinates will be used to locate sampling points; using Deepwell Number 2 (coordinates: North 314.00', East 1289.00') as the fixed point from which all other points can be found.
- 2. Four core samples will be taken from the concrete surface outside the area (see drawing 87-CO-5, sheet 2 attached). The sample locations will be determined by lengthening the sampling radius to 48.81 feet; a multiple of the distance between adjacent sampling points
- 3. Core samples will be analyzed for phenol, naphthalene, and cyanide. The appropriate methods from the manual SW-846, "Test Methods For Evaluating Solid Waste", 2nd Edition, USEPA 1982, will be used.
- 4. Successful clean up will be defined as the mean of the data for each parameter from the background being within three standard deviations of the mean of the data for that parameter from the area.
- 5. If the mean is significantly higher for the area than the background for amy of the three parameters the concrete surface will be removed (by scarification, demolition, or other means) and additional testing will be performed until the concentration levels in the area meet the test in item 4.

Description of Facility Coke Oven Battery Foundations

The area which was recently used to contain coke oven tar decanter sludge was originally a marshy river bottom plain. The area was filled and has been used for heavy industrial activities since just before 1920, when the Rouge Manufacturing Complex was built.

Ford Motor Company constructed two by-product coke batteries on the site in about 1920. The coke batteries remained in this location until they were demolished in the mid-1930's. Only a few drawings of battery foundations remain from that era. Some of the drawings are conceptual drawings while others show great detail and may have been used for construction.

The overall dimensions of the coke batteries were approximately 827 feet by 70 feet. At the midpoint between the batteries a coal bin was constructed to feed coal by gravity to the coke oven charge cars. The coke oven tar decanter sludge was contained on a 30' x 30' area of the concrete pad where the coal bin had once been located. (See Drawing A.)

We believe that the batteries were built upon wooden flotation pilings which were driven to a depth of approximately 75 to 80 feet below the surface. Concrete piling caps may have been poured on top of the piles. Drawings of a typical coke battery foundation from that era prepared for Ford Motor Company indicate that construction generally provided for a continuous 2 foot thick concrete table poured over the piling/piling caps, approximately 4 feet below what is now grade level. (See Drawing B.)

In the early 1940's, a soy bean processing plant was built on the old coal bin foundation. This building apparently occupied the same area as the coal bin until it was torn down in the late 1940's or early 1950's. After the building was demolished the area was used for coal storage. No drawings of this building other than a plot plan have been found. (See Drawing C.)

A visual inspection of the concrete surface, which we believe was the floor of the old soybean plant, shows that it is cracked and spalled. It is uneven with some sections raised apparently to support machinery or steel structures. The floor has also subsided in one area. Coal particles and dust are imbedded throughout the surface. Although the concrete surface of the former soy bean processing building is not uniformly continuous, we do not believe that verification sampling of underlying soils is technically feasible or warranced for a number of engineering and construction reasons. First, coke oven tar decanter sludge is not a liquid but is a semi-solid. Second, a layer of coal or coke breeze separated the sludge from the concrete surface. Finally, messive underlying coke battery foundations, up to 4 feet thick, rest on top of the 2 foot thick concrete table which rests on top of the wooden piles. (See typical construction cross-section, Drawing B.) It would be infeasible to attempt to penetrate these massive subsurface structures, and considering the history of the area it is doubtful that any meaningful results would be obtained.

DEC 29 1987

246,527-31/

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter J. Sherry, Esquire Ford Motor Company The American Road, 556/MHQ Dearborn, Michigan 48121

> Re: Consent Agreement and Final Order Rouge Steel Company Dearborn, Michigan Docket Number V-W-86-R-61

Dear Mr. Sherry:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by Rouge Steel Company. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,	TYPIST	ATTENN	11 H			SIPI	ENGR UNIF	
William H. Miner	1. S. L. 2.16/81	12/14/87		PULL	12/18	WEY (2/18/87	1209	Nazadawa 1
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Enclosure								
bcc: Regional Hearing Clerk R. Grimes, ORC L. Lodisio D. Reape Respectively D. Reape D. Reape D. Respectively D. Resp								
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V BEFORE THE ADMINISTRATOR

IN THE MATTE	ER OF:)		
ROUGE STEEL	COMPANY)))	Docket No.	RCRA-V-W-86-R-61
	Respondent.) })		

STATUS REPORT

COMES NOW the Complainant in this matter and, through its attorney, Roger Grimes, Assistant Regional Counsel, and in response to the Court's January 20, 1988, <u>ORDER TO FILE</u>, states as follows: (the points below are set out in the same order as the Court's Order):

- 1. Whether all issues in the above case have been resolved. All issues in this case have been resolved.
- 2. Whether a Consent Agreement has been prepared and, if so, the location of same.

A draft Consent Agreement and Final Order (see attached copy) was prepared by Region V, and was forwarded to Rouge Steel on October 6, 1987. After several telephone conversations, the Company signed the CAFO on December 9, 1987, and returned it to Region V. The CAFO then went through the normal Agency review and was entered by the Regional

Administrator on December 24, 1987. One of the two originals of the CAFO was sent back to Rouge Steel by letter of December 29, 1987, the other being maintained in the Region V files.

3. Any performance anticipated with respect to said CAFO and by whom, as a means of effecting formal disposition.

The CAFO does require certain performance by Rouge Steel. A description of that performance is set forth pages 2-5 in the "FINAL ORDER" portion of the CAFO. The Company has made a submission dated January 18, 1988 in response to the requirements of Paragraph B on page 3 of the order which is currently under review by the Agency.

Additionally, Rouge is required to pay a civil money penalty of \$26,500 within 30 days of the effective date of the CAFO. The Agency does not anticipate any problems arising in the further performance by Rouge of its obligations under the CAFO.

4. The date, firm and definite, when a CAFO will be finalized and an executed copy forwarded to the [Court].

See CAFO attached.

Respectively submitted,

Roger Gnimes // Counsel for Complainant

CERTIFICATION OF SERVICE

I certify that the foregoing <u>STATUS REPORT</u> was served on the persons named below in the manner specified on January 27, 1988.

Original by hand delivery to:

Ms. Beverely Shorty (5MFA-14) Regional Hearing Clerk U.S. EPA - Region V 230 South Dearborn Street Chicago, Illinois 60604

Copies by regular mail to:

Marvin E. Jones Administrative Law Judge U.S. Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

Peter J. Sherry, Jr.
Rouge Steel Company
3001 Miller Road
Post Office Box 1699
Dearborn, Michigan 48121-1699

Roger/Grimes/

Counsed for Complainant



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: 5HE-12

DEC 2 9 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter J. Sherry, Esquire Ford Motor Company The American Road, 556/WHQ Dearborn, Michigan 48121

Re: Consent Agreement and
Final Order
Rouge Steel Company
Dearborn, Michigan
Docket Number V-W-86-R-61

Dear Mr. Sherry:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by Rouge Steel Company. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

William H. Miner, Acting Chief

Solid Waste Branch

Enclosure

cc: Dennis Drake, MDNR, Lansing Larry AuBuchon, MDNR, Northville

IN THE MATTER OF:

ROUGE STEEL COMPANY 3001 MILLER POAD DEARBORN, MICHIGAN 48121-1699

EPA I.D. No.: MID 087 738 431

DOCKET NO. V-M-86-R-61

CONSENT AGREEMENT AND FINAL ORDER

PRFAMBLE

On July 22, 1986, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCPA) as amended, 42 H.S.C. §6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Pevocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Maste Management Division, Region V, United States Environmental Protection Agency (M.S. EPA). The Respondent is Rouge Steel Company, 3001 Miller Road. Dearborn, Michigan.

STIPULATIONS

The parties desiring to settle this action, enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Compliance Order (Docket No. V-U-86-R-61) in this matter.
- 2. Respondent is a Delaware Corporation whose registered agent in Michigan is the secretary, Ford Motor Company, The American Road, Dearborn, Michigan 48121. Respondent owns and operates a facility located at 3001 Miller Rd., Dearborn, Michigan 49504 (the "facility").
 - 3. Respondent admits the jurisdictional allegations contained in the Complaint.

- 4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint, and by agreeing to this Consent Agreement and Final Order (CAFO), Pespondent makes no admission regarding the regulatory status of its decanter tank tar sludge handling facilities.
- 5. Pespondent explicitly waives its right to request a hearing on the allegations contained in the Complaint.
- 6. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated.
- 7. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. E^{DA} , pursuant to Section 3006(b) of RCPA, 42 U.S.C. 86926(b), to administer a hazardous waste program in lieu of the Federal program.
- 8. This CAFO shall become effective on the date its signed by the Regional Administrator.

FINAL ORDER

Rased on the foregoing stipulations, the parties agree to the entry of the following Final Order:

A. Respondent shall, immediately upon this Order becoming final, cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste treatment, storage, and disposal facilities, Michigan Administrative Code 1985 AACS Part 6, except as provided for in Paragraph 1 and 2 below.

- 1. Respondent has submitted for approval a plan to the Michigan

 Repartment of Natural Resources (MDNP) regarding the hazardous

 waste (decanter tank tar sludge) handling area. MDNR has

 reviewed the plan in accordance with the requirements of Michigan

 Administrative Code 1985 AACS, R299.11003, Rule 1003(1)(m) which

 adopts by reference 40 CFP 265 Subpart G. By letter dated

 September 23, 1987, MDNR approved the plan of which copies are

 attached hereto, as Attachment A.
- 2. Respondent shall implement the approved plan specified in paragraph A(1) above, in accordance with all schedules and conditions contained in the plan.
- R. Respondent shall, immediately upon this Order becoming final, achieve and maintain compliance with the standards applicable to generators of hazardous waste Michigan Administrative Code 1985 AACS Part 3 except as provided below.

Within 15 days of this Order becoming final, Respondent shall provide U.S. FPA and MDNP with the following:

- Documentation that waste characterization has been conducted on all solid wastes generated at the facility, pursuant to the requirements of the Michigan Administrative Code 1985 AACS R299.9302.
- 2. A statement that the appropriate signs have been posted at all hazardous waste storage areas pursuant to the requirements of the Michigan Administrative Code 1985

AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.14(c).

- operation is maintained and operated to minimize the possibility of a fire, explosion, or any sudden or nonsudden release of hazardous waste or waste constituents to air, soil or surface water which could threaten human health and environment and that remedial action has been taken to clean up the spill of decanter tar sludge alleged in the complaint pursuant to the Michigan Administrative Code 1985 AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.31.
- 4. Copies of personnel training records which document compliance to the requirements of the Michigan Administrative Code 1985 AACS R299.9306 and R299.11003(1)(m) which adopts by reference 40 CFR 265.16(d).
- C. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Laura Lodisio RCRA Enforcement Section.
- D. A copy of any documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Dennis Drake, Chief, Compliance Section, Hazardous Waste Division, Michigan Department of Natural Resources, P.O. 30028, Lansing, Michigan 48909.

F. Respondent shall pay a civil penalty in the amount of TWENTY-SIX THOUSAND FIVE HUNDRED (\$26,500) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Rox 70753, Chicago, Illnois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5C-16), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

The N.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of the Treasury pursuant to 31 N.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

This Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinhefore recited.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 II.S.C. §6973, or other statutory authority should the II.S. EPA determine that the handling of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of the Michigan Administrative Code 1985 AACS R299.9101 through R299.11104, inclusive; 40 CFR Part 124 and 270; and this Order. U.S. EPA also expressly reserves any right it may have, to take any action necessary under 3008(h) of RCRA requiring corrective action at the facility.

STGNATOPIES

Fach undersigned representative of a party to this Consent Agreement and Final Order consisting of 6 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

Agreed this	day of	DEC	S 1987	, 1987.
Ry Pouge Steel Company James A Respondent Assistan	A. Courter nt Secretary	_		
Agreed this 24th	day of	Ducen	nfer	, 1987.
Wasil G. Constantelos, Mirecto Waste Management Division Complainant U.S. Environmental Protection Region V	Agency			
this, day of		_	so Ordere	ed , 1987.
Valdas V. Adamkus/ Regional Administrator U.S. Environmental Protection Region V	n Agency			

STATE OF MICHIGAN



ATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLET P. FLUHARTY
KERRY HER
O STEV. I. MYERS
DAVID D OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 3002B LANSING, MI 48909

GORDON E GUYER Director

D. Governor

RAL RESOURCES

Director

September 23, 1987

Mr. G. Doroschewitz, Manager Environmental Engineering Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, Michigan 48121-1699

Dear Mr. Doroschewitz:

The Michigan Department of Natural Resources has reviewed your revised Verification of Cleanup for a coke breeze/tar sludge treatment area. The Verification of Cleanup was submitted as a result of a U.S. EPA enforcement action, complaint number Y-W-86-R-61. The revisions you have made adequately address the deficiencies noted in our June 9, 1987 letter. The Verification of Cleanup was reviewed in accordance with Michigan Administration Code R 299.91003, which adopts 40 CFR 265 Subpart G by reference, and is hereby approved.

As discussed with you and representatives from your company, the closure and cleanup of this area does not relieve you from any future action which may be required under the corrective action provisions of the Hazardous and Solid Waste Amendments of 1984.

If you have any questions concerning this matter, please contact Mr. James D. Roberts of this Division at 517-373-7718.

Sincerely,

Alan J. Howard, Chief Waste Management Division

517-373-2730

cc: Mr. Richard Traub, EPA

3

Ms. Mary Murphy, EPA

Ms. Laura Lodisio, EPA

Mr. Ken Burda/C&E File

Mr. Larry Aubuchan

R1026



MEST HERE WAS THE STATE OF THE

February 26, 1987 Revised: July 10, 1987

Verification of Clean-up (All Wastes Removed)

Owner:

Rouge Steel Company 3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121

EPA I. D. NO .:

MID 087738431

Facility Contact:

G. Doroshewitz Manager, Environmental Engineering Department (313) 323-1260

I. GENERAL INFORMATION - FACILITY CONDITIONS

A. Facility size - Approximately 30' x 30' with coke breeze walls approximately 3' high.

B. Facility volume - Approximately 70 cubic yards to contain waste material.

C. Waste Characterization - The facility was used to contain coke oven decanter tar sludge, EPA Hazardous Waste No. K087.

II. REMOVAL OF ALL INVENTORY

A. Volume of material removed (including waste and debris) - Approximately 200 cubic yards (fourteen truck loads).

B. The coke breeze walls and coke oven decanter tar sludge were removed to the underlying concrete. The coke breeze walls and tar decanter sludge were loaded with a front end loader and placed into 14 cubic yard dump trucks for transport to the Wayne Disposal, Inc. hazardous waste landfill in Belleville, Michigan (EPA ID No. MID 048090633). The material removed was described as "Hazardous waste sludge, N. O. S." and identified as "Waste No. K087" on the waste manifests accompanying each load.

III. DECONTAMINATING THE FACILITY

A. The coke oven decanter tar sludge and the surrounding coke breeze walls were removed to the underlying concrete surface. The concrete surface overlays the foundation for a series of coke ovens

which were demolished in the mid-1930's. A description of the area is included as attachment I. Over the years the area was used for various purposes but mainly as a field storage pad for coal and coke breeze. The dimensions of the coke oven foundation are approximately 827' x 70' and it is believed to be on a concrete mat base from 2' to 4' thick.

- B. Criteria for determining contamination
- 1. Four core samples will be taken from the concrete surface in the low area within the tar decanter sludge area (see drawing 87-CO-5, sheet lattached). The sample locations will be determined using the USEPA "Field Manual For Grid Sampling Of PCB Spill Sites To Verify Cleanup" (EPA-560/5-86-017, May 1986). Rouge Site coordinates will be used to locate sampling points; using Deepwell Number 2 (coordinates: North 314.00', East 1289.00') as the fixed point from which all other points can be found.
- 2. Four core samples will be taken from the concrete surface outside the area (see drawing 87-CO-5, sheet 2 attached). The sample locations will be determined by lengthening the sampling radius to 48.81 feet; a multiple of the distance between adjacent sampling points
- 3. Core samples will be analyzed for phenol, naphthalene, and cyanide. The appropriate methods from the manual SW-846, "Test Methods For Evaluating Solid Waste", 2nd Edition, USEPA 1982, will be used.
- 4. Successful clean up will be defined as the mean of the data for each parameter from the background being within three standard deviations of the mean of the data for that parameter from the area.
- 5. If the mean is significantly higher for the area than the background for any of the three parameters the concrete surface will be removed (by scarification, demolition, or other means) and additional testing will be performed until the concentration levels in the area meet the test in item 4.

Description of Facility Coke Oven Battery Foundations

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DEC 2 4 1987

CAFO for Execution for Rouge Steel Company Docket No. V-W-86-R-61

Robert B. Schaefer and Regional Counsel Basil G. Constantelos, Director Waste Management Division

Valdas V. Adamkus Regional Administrator

Attached for your review and signature is a Consent Agreement and Final Order (CAFO) the terms of which require Rouge Steel Company to implement an approved closure plan for a hazardous waste treatment impoundment and to document compliance with generator requirements which were violated.

Rouge Steel Company is assessed a civil penalty of \$26,500. We recommend that you sign the order on behalf of Region V. When execution of signatures is complete, please return the signed CAFO to William H. Miner, Acting Chief of the Solid Waste Branch, for proper distribution of signed copies.

Attachment

11/124/87

5 RA any /81



(313)845-5122 Office of the General Counsel

Ford Motor Company
The American Road, 556/WHQ
Dearborn, Michigan 48121

December 10, 1987

VIA FEDERAL EXPRESS

Roger Grimes, Esq.
Assistant Regional Counsel
United States Environmental
Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Rouge Steel Company
Docket No. V-W-86-R-61
EPA I.D. No. MID 087 738431

Dear Roger:

Enclosed please find two originals of the Consent Agreement and Final Order executed by Rouge Steel Company. Upon execution of the CAFO by EPA, please return a fully executed version to me for my files. Additionally, I assume that latest date it is signed by EPA is the "effective date" for starting the 30 day clock for payment of the civil penalty.

Sincerely,

P. J. Sherry, Jr.

cc: Mr. G. Doroshewitz Mr. C. H. Porter



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

236 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF 5MF -14

cc: Codisio

Telephone (312) 353-1669

February 18, 1987

Honorable Marvin E. Jones Office of Administrative Law Judge U.S. EPA Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Peter J. Sherry, Jr., Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699

Roger Grimes, Esquire
Office of Regional Counsel
United States Environmental
Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Rouge Steel Company

Docket No. V-W-86-R-61

Dear Gentlemen:

The hearing in the above-captioned proceeding has been scheduled for March 11, 12, 1987, at 10:00 a.m. by Administrative Law Marvin Jones. The location will be at the Federal Building, 536 South Clark, Room 280, Chicago, Illinois. Key can be picked up at the service desk.

A court reporter is scheduled for 10:00 a.m.

Sincerely,

BEVEREIT SINGHE

Beverely Shorty Regional Hearing Clerk

Enclosure

CERTIFICATE OF SERVICE

I certify that this letter notifying parties of the location of the Prehearing Conference and Hearing were sent, <u>Certified Mail; Return Receipt Requested</u> to the following persons on February 18, 1987.

Honorable Marvin E. Jones Office of Administrative Law Judge U.S. EPA Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Peter J. Sherry, Jr., Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699

Roger Grimes, Esquire
Office of Regional Counsel
United States Environmental
Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

BEVERELY SHORTY

February 18, 1987

Beverely Shorty



UNITED STATES ENVIRONMENTAL PROTECTION AGENC

WASHINGTON, D.C. 20460

Office of Administrative Law Judge

December 3, 1986

REGIONAL HEARING CLERK U.S. ENVIRONMENTAL PROJECTED AGENCY THE ADMINISTRATOR

Roger Grimes, Esquire Assistant Regional Counsel U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Pecer J. Sherry, Jr., Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699

Please Reply To:

Office of Administrative Law Judge U.S. EPA Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

CC; Codisio

In re:

ROUGE STEEL COMPANY RCRA-V-W-86-R-61

Dear Counsel:

I hereby acknowledge receipt of your prehearing data, including exhibits.

The requested hearing is hereby scheduled to be held in Chicago, Illinois, beginning Wednesday, March 11, 1987, at 10 a.m. The precise location will be advised prior to the date of hearing.

The parties are hereby authorized to update their prehearing exchange up to and including February 25, 1987. You are urged to stipulate, in writing, to those facts which are not really in issue as a means of saving time and expense.

Your effort to resolve issues by means of an informal conference is com-

cruly yours.

Administrative Law Judge

Original to Regional Hearing Clerk, U.S. EPA, Region V.

NOV 20 1987

Marvin E. Jones Administrative Law Judge Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

Re. Rouge Steel Company
Docket No. RCRA-V-W-85 R-61

Dear Judge Jones:

This is intended to confirm the verbal status report on the above cited matter that I gave to your clerk on November 16, 1987.

By agreement among the attorneys, this matter has been resolved. We have settled all outstanding issues and the Regional Office has drafted and sent to Counsel for Respondent a Consent Agreement and Final Order (CAFO) conforming to the agreement reached in a telephone conference. That CAFO was mailed on October 6, 1987. Since that time I have attempted to contact Mr. Sherry on several occasions to inquire about the status of the Company's signature on the CAFO. I have not been able to determine that status for the reason that Mr. Sherry has refused to return my several calls. However, I believe that settlement of this matter hinges only on the signature of the agreed upon CAFO by Rouge. I would have expected that the CAFO would have been signed and returned to me long before now. Despite these circumstances, I still believe that this matter will be settled shortly by means of a CAFO, and on this basis I suggest that no hearing date be set in this matter.

Sincerely yours,

Roger Grimes Assistant Regional Counsel

cc: Peter J. Sherry
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121-1689

bcc Laura Lodisio, 5HE-12 🗸

RGRIMES:rj/11/19/87/Disk#14



U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR Peter J. Sherry, Jr.
Ford Motor Company
Office of the General Counsel
The American Road
Dearborn, Michigan 48121

Re: Rouge Steel Company
Docket No. V-W-86-R-61
EPA I.D. No. MID 087 738 431

Dear Mr. Sherry:

Please find enclosed two copies of a Consent Agreement and Final Order (CAFO) which can resolve the RCRA action brought by the United States Environmental Protection Agency (U.S. EPA) against Rouge Steel Company under §3008 of the Resource Conservation Recovery Act (RCRA). The CAFO reflect the terms discussed in settlement negotiations.

If the terms of the CAFO are acceptable, please have your client sign and date both copies and return them to me. The U.S. EPA will then sign and date both copies, making the CAFO final, and return one of the copies to you. Please call me at (312) 886-6595 if you have any questions.

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Sincerely yours	A straight of the straight	TYPIST	AUTHOR	OTHER STATE	UNIT	SECT.	SECT.	HWED Light	wwn
Roger Grimes Assistant Regio	BUT. DATE	10-1-87 0-1-87	10/481	Stimes 1	Contraction of the second			CAMPAGEMACO (P. 192 - No. 192 - 192	

cc: Benedict Okwumabua, MDNR

LLODISIO:slowery:10-1-87



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

OCT 1: 1987

REPLY TO THE ATTENTION OF:

5CS-TUB-3

Marvin E. Jones Administrative Law Judge Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

Re: Rouge Steel Company
Docket No. RCRA-V-W-86-R-61

Dear Judge Jones:

This is intended to report to you the status of the above-cited matter.

On September 30, 1987 the Complainant and Respondent conducted further settlement discussions by means of a conference call. During the conference, verbal settlement was reached on all issues as well as the language for a Consent Agreement and Final Order. The Agency will be providing Rouge a final CAFO within the next few days, and we fully anticipate that it will be signed by Rouge management without delay, resolving this matter in its entirety. I would expect that within the next few weeks, the processing of that CAFO will be completed within the Regional office, and I will forward a copy to your office allowing you to close this matter.

very truly yours,

Roger (Grimes

Counsel for Complainant

cc: Peter J. Sherry, Jr.
Rouge Steel Company
3001 Miller Road
P.O. Box 1699

Dearborn, Michigan 48121-1699

bcc: Muno (5HE-12)

Lodisio (5HE-12)

RGRIMES:dj/6-9021/9-31-87/Grimes Disk #14



CC: L. Lodisio (SHE-12)

Office of the General Counsel

Ford Motor Company
The American Road , 556/WHQ
Dearborn, Michigan 48121

September 2, 1987

Roger Grimes, Esq.
Assistant Regional Counsel
United States Environmental
Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Rouge Steel Company Docket No. V-W-86-R-61

EPA I.D. No. MID 087 739 431

Dear Roger:

This letter is in response to your letter of August 27, 1987, and provides the response of Rouge Steel Company ("Rouge") to the latest draft of the proposed Consent Agreement and Final Order. ("CAFO")

First, let me apologize for the delay in my response following our conference call of August 11, but it was necessary to determine where the Michigan DNR stood with respect to its approval of Rouge's plan regarding the hazardous waste handling area. We now understand, however, that the Michigan DNR solicited public comments to Rouge's plan and that a final decision on the plan should be received by September 12.

As I am sure you can understand, it is necessary to recieve this approval before finalizing the CAFO. Rouge has always asserted that it is necessary to have this issue settled as part of the overall settlement in order to avoid the possibility of the Michigan DNR proceeding separately against the Rouge. We propose, therefore, that we await the approval of the Michigan DNR and then refer to an approved plan in the CAFO.

My other comments are as follows:

(1) In Stipulation (1), could you please state the date of the complaint (July 21, 1986). Given that the final

statue 1st of

authorization to the State of Michigan was granted on October 30, 1986, and the rather sticky jurisdictional issues which result, I believe it is important to make clear that the complaint was filed prior to the grant of such authorization.

- On Page 5 of the CAFO, you have added a provision, not present in any of the prior drafts, authorizing EPA to assess up to \$25,000 for each day of non-compliance with the I seriously question the validity of such CAFO. provision, especially in the context of the present CAFO. Although it is true that the complaint was filed prior to the time Michigan's hazardous waste program was authorized, the CAFO has been modified so that all compliance items are now required to be submitted to the Michigan DNR and comply with Michigan rules as opposed to federal regulations. believe given this that change, the bracketed references to the CFR in Parts A and B of the final order should be deleted). Since compliance now is to be governed by the Michigan rules, and thereby becomes more prospective in nature, I believe that the EPA is without the authority to assess penalties under §3008, especially with the lack of notice to the State required under §3008(b). Accordingly, I believe this paragraph should be stricken and the second to last sentence on Page 5 should be amended to read: "U.S. EPA also expressly reserves any rights it may have to take ..."
- (3) The revisions made by you to the CAFO also raise other questions, such as will the Michigan DNR or the EPA review Rouge's submissions? It seems that EPA has no authority to review compliance with state rules unless the authority is somehow delegated to the EPA by the state. In this context I note with interest that the revision to the lead paragraph of Section B of the final order (Page 3) now requires specifically that we comply with the Michigan Administrative Code, except with respect to the items enumerated below. The prior draft required only that we comply with "applicable" hazardous waste rules. Since Michigan DNR now has such an expanded role in this CAFO, I believe they also should be a signatory.

From the modifications to the CAFO, it is apparent that I need to understand in greater detail what the role of the Michigan DNR will be in the enforcement of the CAFO. Please let me know your thoughts.

Sincerely,

. Sherry, Jr

Peter J. Sherry, Jr. Ford Motor Company Office of the General Counsel The American Road Dearborn, Michigan 48121

Re: Rouge Steel Company
Docket No. V-W-86-R-61
EPA I.D. No. MID 087 738 431

Dear Mr. Sherry:

Since Laura Lodisio, of our RCRA Enforcement Section and I were unable to contact you at the time of our scheduled conference call on August 13, 1987, and on several occasions since, I am forwarding the enclosed documents in order to expedite resolution of this matter. Please find enclosed two copies of a Consent Agreement and Final Order (CAFO) which can resolve the RCRA action brought by the United States Environmental Protection Agency (U.S. EPA) against Rouge Steel Company under §3008 of the Resource Conservation Recovery Act (RCRA). The CAFO reflects the terms discussed in settlement negotiations.

If the terms of the CAFO are acceptable, please have your client sign and date both copies and return them to me. The U.S. EPA will then sign and date both copies, making the CAFO final, and return one of the copies to you. Please call me at (312) 886-6595 if you have any questions.

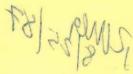
Sincerely yours,

Roger Grimes Assistant Regional Counsel

Enclosures

cc: Benedict Okwumabua, MDNR

LL0DISIO/slowery/08-21-87





IT



ce: Lodisio (SHE-1Z)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

In the Matter of:

5/22/87

ROUGE STEEL COMPANY 3001 MILLER ROAD DEARBORN, MICHIGAN 48121-1699

Docket No. V-W-86-RL-61

MID 087 738 431

STATUS REPORT

Respondent, Rouge Steel Company, hereby files this status report in the above captioned matter, as directed by an order of April 30, 1987.

Respondent is continuing to negotiate with the Michigan Department of Natural Resources (the "MDNR") concerning a demonstration of clean up of the alleged surface impoundment. As this time, this is the remaining open issue contained in the above capitioned matter which needs to be settled. today's date, Respondent has sent to the MDNR additional documents requested by the MDNR in order to ascertain the area that was covered by the alleged surface impoundment.

Respondent expects that discussions with the MDNR on this issue will occur in the next 1-2 weeks, from which Respondent will be able to more readily determine whether Respondent and MDNR will be able to settle this issue.

Respectfully Submitted:

Peter J. Sherry, Jr. Counsel for Respondent

Rouge Steel Company

The American Road, Rm. 556/WHQ

Dearborn, Michigan 48121

(313) 845-5122

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May, 1987, the foregoing Status Report (a) was filed by placing the original in the United States mails, postage pre-paid, and addressed to Ms. Beverly Shorty, Regional Hearing Clerk, (5MF-14), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, (b) with a copy placed in the United States mail, postage pre-paid, and addressed to Marvin E. Jones, Esq., Administrative Law Judge, Office of Administrative Law Judge, U.S. EPA, 726 Minnesota Avenue, Kansas City, Kansas 66101, and (c) has been served by placing a copy thereof in the United States mails, postage pre-paid, and addressed to Roger Grimes, Office of the Regional Counsel, (5C-16), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.

J. Sherr

5/1/87 CC: Lodisio (5HE-12)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION ${f v}$

IN THE MATTER OF:

ROUGE STEEL COMPANY)
3001 Miller Road) Docket No. V-W-86-R-61
Dearborn, Michigan 48121-1699)

MID 087 738 431

UNOPPOSED MOTION FOR EXTENSION OF HEARING DATE

Respondent, Rouge Steel Company, hereby moves for a postponement of the date for the commencement of the hearing in the above captioned matter, presently scheduled to commence in Chicago, Illinois on May 6, 1987.

support of this motion, Respondent states that In engaged in settlement Respondent and EPA have been negotiations. The settlement negotiations have progressed to the point where only one issue remains to be resolved and Respondent believes it is reasonably likely that such issue, and all issues presented by the above captioned matter, can be settled without the necessity of a public hearing. Given the potential for settlement of the issues presented in this matter, a postponement in the proceedings will prevent the possible waste of scarce EPA and Respondent resources.

Moreover, because the alleged violations are not continuous in nature, a delay of this length will not adversely affect the public interest.

Counsel for EPA has been contacted regarding the requested extension and has authorized Respondent to state that EPA has no objection to its being granted.

Respondent respectfully requests that a postponement of the date for the commencement of the public hearing be granted. Counsel for Respondent and EPA will file periodic status reports and, if they are unable to settle this matter in a reasonable period of time, a day and time for the hearing may then be fixed.

Respectfully submitted,

Peter J. Sherry, Jr. Counsel for Respondent

Rouge Steel Company

The American Road, 556/WHQ Dearborn, Michigan 48121

(313) 845-5122

2358G

CERTIFICATION OF SERVICE

I hereby certify that an original of the foregoing was served on (a) The Honorable Marvin E. Jones, Administration Law Judge, Office of Administrative Law Judges, U.S. EPA, 726 Minnesota Avenue, Kansas City, Kansas 66101, (b) Ms. Beverly Shorty, Regional Hearing Clerk, (5MF-14), Region V, 230 South Dearborn, Chicago, Illinois 60604, and a correct copy was served by placing a copy thereof in the United States mails, postage prepaid, and addressed to Roger Grimes, Office of the Regional Counsel (5C-16), U.S. EPA Region V, 230 South Dearobrn Street, Chicago, Illinois 60604.

Peter J. Sherry, Jr.,

Counsel for Rouge/Steel Company

1989G



UNITED STATES ENVIRONMENTAL PROTECTION

WASHINGTON, D.C. 20460

Office of Administrative Law Judge

April 30, 1987

Roger Grimes, Esquire Assistant Regional Counsel U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Peter J. Sherry, Jr., Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699

Please Reply To:

Office of Administrative Law Judge U.S. EPA 726 Minnesota Avenue Kansas City, Kansas 66101

GIONAL HE

PROTECTION

U.S.

CC: Ladisio (5HE-12)
Radell

ROUGE STEEL COMPANY RCRA-V-W-86-R-61

Gentlemen:

This will confirm the teleconference this date at 2:30 p.m. CDT wherein it was determined that the hearing now scheduled to begin on May 6, 1987, in Chicago, Illinois, should be continued, for the reason that Counsel have settled all issues except one and it is anticipated that the remaining issue can be resolved in further negotiations between the parties.

It is ORDERED that the hearing requested herein should be and it is hereby continued to a date to be set. The Regional Hearing Clerk, EPA, Region V, is hereby instructed to cancel arrangements for the courtroom and court reporter mentioned in her letter to all interested parties, dated April 20, 1987.

It is further ORDERED that Counsel shall file a report of the results of their negotiations for settlement on or before May 22, 1987, and on the 20th day of each succeeding month until this matter is concluded by agreement or said hearing is re-scheduled.

Very Truly your

Marvin E. Jones Administrative Law Judge

Original to Regional Hearing Clerk, U.S. EPA, Region V.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

21 APR 1987

REPLY TO THE ATTENTION OF:

Frank W. Vanderheyden
Mail Code A-110
Administrative Law Judge
Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

RE: Addison Products Company
Bocket No. RCRA-V-W-85-R-42

Dear Judge Vanderheyden:

In accordance with your April 10, 1987 Order, this is intended to report to you the status of the above-cited matter. I have today spoken with counsel for Addison who has informed me that the settlement documents which I provided to him have been sent to Addison for signature. He anticipates receiving them back from Addison at any time, and will send them on to me as soon as he gets them. I will then procure the appropriate signatures in the Region and forward them to you. In essence, we have reached settlement of this matter and are now just processing the settlement papers.

Very truly yours,

Roge Grimes

Assistant Regional Counsel

cc: Richard A. Wilhelm

Dickinson, Wright, Moon,

Van Dusen & Freeman

800 First National Building Detroit, Michigan 48226

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

IN THE MATTER OF
ADDISON PRODUCTS COMPANY,

Docket No. RCRA-V-W-85-R-42

Respondent

ORDER

The file in this matter shows that respondent advised the office of the undersigned on February 20, 1987 that the matter had been settled; that his client would execute the consent agreement the following week; and that it would be returned to complainant at that time.

IT IS ORDERED that, within 10 days of the below service date, complainant advise the undersigned concerning the current status of this matter.

Frank W. Vanderheyden Administrative Law Judge

Dated: N

ashington, D.C

IN THE MATTER OF ADDISON PRODUCTS CO., Respondent Docket No. RCRA-V-W-85-R-42

Certificate of Service

I certify that the foregoing Order dated April 10,1987 was sent this day in the following manner to the below addressees:

Original by Regular Mail
To:

Regional Hearing Clerk
Region V
U.S. Environmental Protection
Agency
230 South Dearborn Street
Chicago, Illinois 60604

Copy by Regular Mail To:

Attorney for Complainant:

Roger Grimes, Esquire
Office of Regional Counsel
U.S. Environmental Protection
Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attorney for Respondent:

Richard A. Wilhelm, Esquire Dickinson, Wright, Moon, Van Dusen & Freeman 800 First National Bldg. Detroit, Michigan 48226

> Helen F. Handon Secretary

Dated: April 10, 1987

STATE OF MICHIGAN

Laura

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY

MARLENE J. FLUHARTY STEPHEN V. MONSMA). STEWART MYERS AVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

KONWINDKOK KINDOM KONWINDK

Gordon E. Guyer, Director S.E. Michigan Field Office 505 W. Main Northville, MI 48167

April 2, 1987

REGEIVED

APR 07 1987

U.S. EPA, REGIGN V WASTE MANAGEMENT DIVISION HAZARDOUS WASTE ENFORCEMENT BRANCH

Mr. Gerald Doroshewitz Rouge Steel Company 3001 Miller Road Dearborn, MI 48121

RE: MID 087738431

Dear Mr. Doroshewitz:

On March 30, 1987, an inspection was conducted at your facility located at 3001 Miller Road, Dearborn, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; and Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

- Some inspection reports from the coke ovens were missing either the date of inspection or the inspectors signature. 40CFR265.15(d)
- The inspection reports failed to indicate the specific concerns for which the areas are inspected. The new inspection reports may resolve this violation but must be implemented first. 40CFR265.15
- Contingency plan needs to be updated with the correct MDNR local office phone number. 40CFR265.54
- 4. Job descriptions were not set up for the various job classifications and personnel requiring training. Because of the difficulty the plant has complying with this requirement, it is suggested that the company concentrate on only those personnel which are required by RCRA definition to be trained and concentrate on only the portion of their duties as it relates to hazardous waste activity. 40CFR265.16(d)(2)

Page 2, 4-2-87 Rouge Steel Company Dearborn, MI 48121 RE: MID 087738431

5. Wastes leaving the site must be properly manifested. The Hi Line and BOF receiving manifests lacked adequate information on line 11 for DOT description and codes. Some manifests from Steel Div. - A section are missing 1979 P.A. 64 as amended item 16, the generators date. R304(2)(e) and 304 (4)

An additional concern is the shipment of pickle liquid (KO62) to Englebrook as unregulated, non manifested material. Please provide more data regarding Englebrooks handling and treatment of the pickle liquid verifying it meets the exemption in RCRA.

We request your response by April 23, 1987, documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Lynne King

Hazardous Waste Division

LK:cs Enclosure

cc: B. Okwumabua Laura Ladisio LAW OFFICES

HONIGMAN MILLER SCHWARTZ AND COHN 2290 FIRST NATIONAL BUILDING DETROIT, MICHIGAN 48226

TELECOPIER (313) 962-0176 TELEX 235705

JOHN W. VOELPEL

March 6, 1987

DIRECT DIAL NUMBER
(3)3) 256-7536

Michael Berman, Esq.
Asst. Regional Counsel
U.S. Environmental Protection Agency
230 S. Dearborn St.
Chicago, IL 60604

Re: Michigan Disposal, Inc. RCRA Docket No. V-W-86-R-37

Dear Mr. Berman:

In accordance with our conversation today, I am enclosing a copy of the opinion in Northside Sanitary Landfill, Inc. v Thomas, 804 F2d 371 (7th Cir 1986). Region V of the U.S. Environmental Protection Agency ("EPA") argued (804 F2d at 380) and the case held that because Indiana had received authorization under the federal Resource Conservation and Recovery Act, Region V had no continuing jurisdiction regarding closure of facilities in Indiana.

As I suggested, this case would seem to indicate that the subject complaint can be resolved rather easily, at least regarding any closure concerns associated with the stormwater run-off lagoon (the "Lagoon"). The case indicates, I believe, that Region V need not worry about actual closure of the Lagoon, but must leave that concern, if one exists, to the State of Michigan and the Michigan Department of Natural Resources.

As you know, Michigan Disposal, Inc. ("MDI") believes that it adequately closed the Lagoon in 1985 pursuant to a closure plan approved by EPA and MDNR. Further, MDI's consultants, Neyer, Tiseo & Hindo, Ltd., on August, 21, 1986, confirmed its original certification of the Lagoon's closure filed on November 8, 1985.

Based on the facts and the enclosed opinion, it appears that any Consent Agreement and Final Order need not address any continuing concerns with the Lagoon closure. Please let me have your written position at your earliest convenience since the Northside opinion may eliminate the need to devote further time and effort to this matter.

John W. Voelpel

/klh

Enclosure

cc w/enc: Walter W. Tomyn

David Lusk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR



IN THE MATTER OF:

ROUGE STEEL COMPANY,

RESPONDENT

DOCKET NO. V-W-86-R-61

a: Lodisio

ORDER CONTINUING ADJUDICATORY HEARING

COMES NOW Respondent, Rouge Steel Company, and moves for a 60-day extension of the date for commencement of the hearing requested herein, now scheduled to begin on Wednesday, March 11, 1987, at 10 a.m., in Chicago, Illinois.

Said Motion states that negotiations for settlement have progressed and it is considered likely that all issues can be resolved without the necessity of said hearing, and that EPA Counsel has no objection to the continuance prayed.

In the premises, I find that said Motion should be and it is hereby granted.

It is ORDERED that the hearing requested herein is hereby rescheduled to begin in Chicago, Illinois, on <u>Wednesday</u>, <u>May 6, 1987</u>, beginning at 10 a.m.

The parties are hereby authorized to update their prehearing exchange if prepared and filed with the Regional Hearing Clerk, the other party and me on or before April 24, 1987.

So ORDERED.

DATED: February 26, 1987

Marvin E. Jones

Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the Original of the foregoing ORDER CONTINUING

ADJUDICATORY HEARING was forwarded via Certified Mail, Return Receipt Requested,
to Ms. Beverely Shorty (5MFA-14), Regional Hearing Clerk, U.S. EPA, Region V,

230 South Dearborn Street, Chicago, Illinois 60604; that a True and Correct

Copy was delivered in the same manner and to the same address to Counsel for

Complainant, Robert Grimes, and a True and Correct Copy was forwarded in the

same manner to Counsel for Respondent:

Peter J. Sherry, Jr., Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699;

all such service effected this 26th day of February, 1987.

Mary Lou Clifton

Secretary to Marvin E. Jones, ADLJ



Office of the General Counsel

Ford Motor Company The American Road Dearborn, Michigan 48121

November 26, 1986

VIA FEDERAL EXPRESS

Mr. Roger Grimes
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

cc: Lodisio

Re: RCRA Complaint V-W-86-R-61

Rouge Steel Company
Dearborn, Michigan

Dear Roger

This letter is Rouge Steel Company's ("Rouge") response to your informal discovery request dated October 30, 1986, and is in follow-up to our telephone conversation of Thursday, November 13, 1986. The numerical designation of Rouge's response, below, corresponds to that of your informal discovery request.

- 1. As we discussed, the concrete slab, which was the base for the alleged surface impoundment, dates back over 50 years when it served as a part of a coke battery, removed from service in the mid-1930's. Not surprisingly, Rouge does not have any plans or drawings showing how the concrete slab was constructed or the precise materials used in the concrete with which the slab was constructed. As promised, however, we have attached a drawing (Attachment I) of the concrete slab, giving diminsions of the entire slab and identifying the area where the tar sludge was held pending shipment. The area where the tar sludge was held was relatively constant and did not move over the entire slab.
- 2. The only documents Rouge has been able to discover concerning its agreement with Wayne Disposal, Inc.,

Mr. Roger Grimes Page 2 November 26, 1986

regarding the disposal of the KO87 is, as we stated, the purchase order and the corresponding invoices/shippers. (Attachment II)

- 3. We have attached waste characterization analyses of K087. (Attachment III) Rouge has not conducted a Paint Filter Liquids Test, Method 9095 on the K087 tar sludge and, as we consider the material non-liquid, has not conducted any other analyses on the tar sludge, As we stated in our telephone conversation, Rouge does not have any records of any analyses which may have been performed by others. Moreover, we inquired of Wayne Disposal, Inc., and were informed that it has no records of any testing on the K087 performed by it.
- 4. Based on the method used to load the tar sludge onto trucks for disposal, there is no way to determine the quantity or ratio of tar sludge mixed with coke breeze. The coke breeze was piled around a portion of the slab and segregated the tar sludge from the surrounding area. When the sludge was to be transported, a front-end loader would scoop up coke breeze while penetrating the sludge being held. The sludge and the coke breeze were then loaded on a truck together, the coke breeze causing the sludge to be less sticky and, thus, easier to unload.
- 5. The sole purpose of adding the coke breeze to the tar sludge was for ease of unloading. No analysis has been made of any physical or chemical properties which may have been imparted to the sludge because of the addition of the coke breeze. As the sludge does not contain free liquids, the coke breeze was not added to decrease any free liquids in the waste. Again, the coke breeze was added only for unloading ease.
- 6. We described the surge tank in Rouge's submission of October 9, 1986 to EPA. The tank is vented to equalize its pressure, but because the gas is not volatile, no air pollution control is required or used. We are enclosing as Attachment IV a flow diagram which demonstrates, in part, how any leaks from the filtration system would be contained in a concrete lined trench. We are looking to see if additional drawings exist showing the connection of the concrete trench to the pitch pit. If we are unable to find any such drawings, we could demonstrate to you how it is connected if you were to visit the Rouge Steel facility.
- 7. As we discussed, you were going to talk to Laura Lodisio and provide us with clarification on the need to provide more specific information with respect to the filtration treatment system than that provided in our October 9 submission.

Mr. Roger Grimes Page 3 November 26, 1986

- 8. The gas cooling system does not control air pollution.
- 9. As with item number 7, you were going to talk to Laura Lodisio and provide us with clarification on the information requested.

After you have had a chance to review the materials provided, please call me with any further questions you may have. I also would like to schedule another settlement conference at the earliest possible time. Moreover, I firmly believe that if we could have it in Dearborn, where we would have the ability to view the site so that everybody could better understand the facility and the materials with which we are dealing, it would greatly facilitate settlement discussions.

Sincerely,

P. J. Sherry, Jr

1582T

PURCHASE ORDER STATIAMENDIENT

10 og 48 126 JAN IU

SHOW THIS PURCHASE DRDER NUMBER ON SHIPPING AND BILLING PAPERS

AMMON CANADA CONTRACTOR AND CONTRACT

Attachment II NP 51339

AMENDMENT NUMBER 3

AMENDMENT DATE 12-20-85

EFFECTIVE DATE 1-1-86

Supplier Dune Code NO 7 8 A Number

ELLER, WILL BELL AND DELIVER BUPFLES OR BERVICES BRECIPED MEREN
UBLECT TO THE TERMS AND CONDITIONS ON THE FACE AND REVENUE SDE MEREOF

Wayne Disposal, Inc.

rearborn, MI 48128

. O. Box 5187

CODE NUMBER:

DESCRIPTION OF MATERIAL: Disposal of waste material - all Ford locations

THE ABOVE PURCHASE ORDER IS HEREBY AMENDED BY CHANGING THE: Price and terms

FROM

PRICE

TO

PRICE

As written

Renewed subject to termination or modification in accordance with on going negotiations between Wayne Disposal and Ford Motor Company over the Van Buren Township Disposal site.

Extend order to include the period 1-1-86 through 12-31-86.

The disposal costs shown cover waste materials accepted for landfill without processing or treatment and are effective 1-1-85.

Continued on page 2

"BILL TO" LOCATION: AS RELEASED

"SHIP TO" LOCATION

AS RELEASE

Ford Motor Co., Purchasing E. Black, 148/jd (2139A-8)

DELIVERY TO REMAIN UNCHANGED UNLESS INDICATED ABOVE This purchase order amendment does not tenuire acknowledgement. assumed that the provision this amendment are acceptable to you. you do not accept it as whateh. please leturn it with your counterproposal amediately.

Page 1

- over -

PURCHASE ORDER AMENDMENT

Cubic Yard

55-gallon

Page #

Demo, Muni, Cref. f. Misc, Flya. Fsan, Lime

compactors, transfer trailers)

Wayne Disposal Code Identification

Comp (Compacted refused from roll-off

NP 51339

AMENDMENT NUMBER 3

AMENDMENT DATE 12-20-85

Wayne Disposal, Inc. . O. Box 5187 Jearborn, MI 48128

Duns Number

Add:

Rubbish

Asbestos Drum

Non-Hazaradous Material

Slud, Gran. Csol. Crum, Note Drum

Hazardous Material

D-Series K-Series F-Series

Drum

EHRD (Empty Hazaradous Drum)

Large Concrete (LCON) Small Concrete (SCON) Railroad Ties (TIES) Tires (TIRE)

Stumps. Trees (TREE)

Empty Drums (Non-Haz) (DRUM)

Cubic Yard

Disposal Cost

Cubic Yard 2.00

\$.72

Cubic Yard 4.33 55-Gallon 5.00

Cubic Yard 2.67

55-Gallon 6.67

Average* 33,33 Good * 25.00 Magrinal 16.67

Marginal*

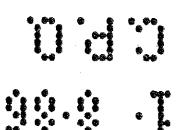
Average 13.33 Good 11.67

Cubic Yard 2.00 Cubic Yard 1.00 Cubic Yard 2,00

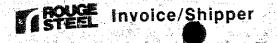
Cubic Yard 1.67 Cubic Yard 3.34 Drum 1.00

Contact SSECO or P&SS for physical evaluation criteria dated March 7, 1986.

(2139A-9)



	Purchas	a Alasi	élant:	.	Show these n	umbers on i	hipping	and hill	Att	achment II
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	Release	Purchas	e Order	☐ Requisition	51339	. 114.	No.		nket orde ちータ1タ	' IS CILLETED ST INF
	Company, buyer, a		rchase a	and receive, and	F.O.B. (Title transfer Carrier		other) •	770	Date of oro	
WATIE	DISPOSAL INC	i i			seller's plant	Destina- ion				23 12
ru bu	¥ 5187				Transportation terms	•.	other)		Delivery de	
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Rouge Steel Company
P.O. Box 1639

Attachment II

Make remittances to:
P.O. Box 67-239A
Invoice No. RS-

Invoice No. RS- 257104

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Rouge Steel Company P.O. Box 1639 Dearborn, Michigan 48121 P.O. Box 67-239A Detroit, Michigan 48267

Location Code-4501

Invoice No. RS- 258214

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invoice/Snipper

Rouge Steel Company

Ittachment II

Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267

P.O. Box 1639 Dearborn, Michigan 48121

Location Code-4501

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ISTEEL Invoice/Snipper

Rouge Steel Company

P.O. Box 1639 Dearborn, Michigan 48121 Attachment It

Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267 n, Michigan 48121 Invoice No. RS- **258381**

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INVOICE/Shipper

Rouge Steel Company

Affachment II

P.O. Box 1639

Location Code-4501

Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267

Dearborn, Michigan 48121

Invoice No. RS- 258380

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Attachment II Location Code-4501

Make remittances to: P.O: Box 67-239A Detroit, Michigan 48267

Rouge Steel Company
P.O. Box 1639
Dearborn, Michigan 48121

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Attachment II
Location Code-4501

Invoice No. RS- 260034

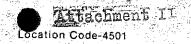
Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267

Rouge Steel Company
P.O. Box 1639
Dearborn, Michigan 48121

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Rouge Steel Company



Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267

P.O. Box 1639 Dearborn, Michigan 48121

Invoice No. RS- 261918

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Invoice/Shipper

Rouge Steel Company

P.O. Box 1639 Dearborn, Michigan 48121 Attachment II Location Code-4501

Make remittances to: P.O. Box 67-239A Detroit, Michigan 48267

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3985 RESEARCH PARK DRIVE ANN ARBOR, MICHIGAN 48104 313/761-1389

September 5, 1985

Mr. John A. Scott ROUGE \$TEEL COMPANY 3001 Miller Road P.O. Box 1697 Dearborn, MI 48121-1699

Dear Mr. Scott:

Enclosed is the data generated on the samples obtained by us in compliance with your hazardous waste control program. The data on the four light oil muck samples indicated that this material is not hazardous under the RCRA guidelines. The remaining materials do indicate at least one hazardous characteristic, except for the electric arc furnace dust. I have been informed that the characteristics of this dust can change significantly depending upon the character of the feed materials used in the furnace. Consequently, I am not sure what the potential would be for delisting this material without further testing.

Very truly yours,

ENVIRONMENTAL CONTROL TECHNOLOGY CORPORATION

John E. Schenk

Executive Vice President

JES/crn

Enclosure

32074

HATERIAL

Coke Oven Tar Sludge

PHYSICAL STATE

Black, "Sticky", Amorphous Solid - Phenolic & Naphthalene Odor

RCRA CHARACTERISTICS

IGNITABILITY

PLASHPOINT

61°C

CORROSIVITY

PE

N.A.

REACTIVITY (mg/l)

CYANIDE

SULFIDE

TOXICITY-EXTRACTION PROCEDURE (mg/1)

ARSENIC	0.004	LEAD	< 0.02
BARIUM	0.08	MERCURY	< 0.0002
CADMIUM	< 0.02	SELENIUM	< 0.002
COPPER	< 0.02	SILVER	< 0.01
CHROMIUM	0.05	ZINC	0.06



Attachment TAR DECANTER TANK SLUDGE

CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

Number 500015

TO:	D. O'Connor		April 2, 1985
SUBJECT:	Tar Sludge - DECAN Part Number: Not Pr Specification: Not Pr Supplier: Rouge	ovided	
OBJECT:	Perform physical and ch for information.	emical tests on t	he submitted sample
TEST DATA:		Results	Specification
Toxicity Tes Cya	rocedure (E.P.) ^a t; (SW 846, Method 1310) nide, mg/L A 600/4-79-020,M 335.1)	0.01	20
(st	avalent Cromium, cr ⁺⁶ , mg/l andard Methods, 15 th Ed, O, Method 312-b)	3.5	· <u>-</u>
Ignitability Flash point (ASTM D96)	ь	None till 70°C	>6U ^O
Reactivity Reaction wit	h IN Hydrochloric acid	No Violent Reaction	
Reaction wit	h 1N Sodium hydroxide	No Violent Reaction	
Reaction wit	h Water	No Violent Reaction	
Corrosivity pH	b		
(10g in 100 i	ml water) 9-020, M 150.1)	6.4	> 2 and < 12.5
Density (g/m (ASTM D1298-		1.222 at 87°C	
% Solids (w/ (ASTM D473)	w)	23.1	



CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

Number 500015

TEST DATA: (continued)

Results

Specification

Phenois (Total), mg/Kg

(EPA-600/4-79-020, M420.1)

3049

Naphthalene, (w/w) (Gas chromatography) 5.4%

"a" - Michigan Act 64 of 1979, maximum concentration of contaminants for characteristic of extraction procedure toxicity.

"b" - Specification for evaluating solid waste, EPA solid waste - 846, 1982.

Metals results will be forwarded separetly by Inorganic Section, Metallurgy Department.

DPL/pp

Environmental Section Chemistry Department

Laboratory Specialist



CENTRAL LABORATORY

LABORATORY INVESTIGATIVE REPORT

500015

June 1, 1985

TO:

David O'Connor

SUBJECT:

Part Name:

Tar Sludge

Part Number:

Not Provided

Specification: Not Provided

Supplier:

Not Provided

OBJECT:

Determine elemental composition of the submitted

sample for information purposes only.

TEST DATA:

Results are reported in mg/L.

Arsenic	<0.1
Barium	0.05
Cadmium	<0.1
Chromium	<0.05
Copper	<0.05
Lead	<0.1
Mercury	< 0.03
Nickel	< 0.03
Selenium	<0.1
Silver	< 0.3
Zinc	1.1

Analyzed by Inductively Coupled Plasma Emission Spectroscopy

Metallurgy Dept.



CENTRAL LABORATORY SERVICES

LABORATORY INVESTIGATION REPORT

阿洛斯BFACTUS!有名 医阿克(阿里克尼(阿克 ENVIRONMENTAL COMINGL

NUMBER 105723

November 16, 1981

TO:	John F. Schultz					
SUBJECT:	Decanter Tank Tar Sludge Supplier: Steel Division					
OBJECT:	To determine density and % solids as well as phenol and napthalene contamination of Decanter Tank Tar Sludge for information.					
TEST DATA:		Results	Specification	<u>Analyst</u>		
	Density	1.21 g/ml	ASTM D891	BAS		
-	% Solids (% Non-Volatiles)	80.00 %	FLTM BI 2-1	BAS		
	Phenol	2137.234 mg/L	EPA79 M420.1	BAS/JF		
	Napthalene	3.307 g/kg	HPLC	DPL		
	Cyani de	17.39 mg/L	EPA79 M335.2	BAS		
	•					

Concur:

J.A. Galloway, Section Supervisor

Environmental Section Chemistry Department

BS

TO at 81 16011-2



CENTRAL LABORATORY SERVICES GENERAL SERVICES

Attachmen 6

LABORATORY INVESTIGATION REPORT

UMBER _____00509

8-29-80

TO:

G. M. Hutter

SUBJECT:

Coke Oven Tar Sludge

OBJECT:

Test per request.

TEST DATA:

1. E. P. Toxicity per U. S. E. P. A. SW-846, 1980

Element		Results	mag	Specificat Limits, p		Method of Analysis
Arsenic		(0.1		5	****	EPA 600/4-79-020
Barium		< 0.8		100		EPA 600/4-79-020
Cadmium		<0.005	Į .	1		EPA 600/4-79-020
Chromium		<0.1		5	r e	EPA 600/4-79-020
Lead	•	0.2		5	72 C	EPA 600/4-79-020
*Mercury		(0.2	100	0.2		I. C. P.
Selenium		< 0.25		1		EPA 600/4-79-020
Silver	et.	<0.1		5		EPA 600/4-79-020
Mercury		0.1	-	0.2	200 H	

^{*} A supplemental report will follow with Mercury values tested to EPA 600/4-79-020.



CENTRAL LABORATORY SERVICES

GENERAL SERVICES

LABORATORY INVESTIGATION REPORT

NUMBER _005092

TEST DATA:

(Continued)

Page 2

2. Ignitability per U.S. E.P.A. SW-846, 1980, Section 4.0

Flash Point ASTM D 93

>60 c

3. Reactivity per U.S. E.P.A. SW-846, 1980, Section 6.0

Total Cyanide E.P.A. 79, M3352 10.65 ppm

Galloway, Section Supervisor(\

Environmental Section Chemistry Department

Concur:

D. Craig, Supervisor Metallurgy Department

KGR: CH: NK/em

FED 70 16011-2

ROUGE STEEL COMPANY Coke Oven Operation Filtration Before Deep Well Injection Technical Summary

Background

Rouge Steel Company produces coke from coal for use in its iron-making operations. By-products of coke production are recovered and utilized as various products. One by-product of coking which is not utilized is water. Excess water is blown down from the Naphthalene recovery system and disposed of by injection in an on-site deep well. To make this excess water amenable for deep well disposal, the water must be filtered. Filtration removes small particles of Naphthalene that could plug the deep well receiving geologic formation. Filtration takes place in a series of closed steel containers integrally connected by solid steel piping and integrally connected to an industrial production process. Filtered water is injected in the deep well. Removed material - Naphthalene - and the filter media are returned to the coking process.

Coke Process

Conversion of coal into coke is a distillation process. Coal is heated in the absence of oxygen to form coke (carbon) and a variety of products. By-products are removed from the coke ovens by gas mains as a hot gas. The gas is cooled in the mains by ammonia liquor. This liquor picks up tar, light oils, and ammonia. Partially cooled gas passes through water sprays in the final gas coolers. At this point Naphthalene and moisture from the coal condense out. Naphthalene is distilled from the cooler water/naphthalene/moisture mixture. Condensed moisture must be removed from the final cooler water system to prevent the system from overflowing. Final cooler water blow down is a non-ignitable, non-corrosive, non-volatile waste containing cyanide and sulfide (see Attachment 1).

Water Disposal

The final cooler water level is monitored in the final cooler Sump. When the water rises to a pre-determined level, a sensor transmits a signal to a Bristol controller to open the Bristol Diaphragm Valve (see Attachment 2). The valve remains open until the water level drops to the desired operating level. Final cooler water system blow down is disposed of by deep well injection. If this water is injected as blown down, small Naphthalene particles in the water will blind the receiving formation and fill the well casing.

To make this blow down more amenable for disposal, a set of filters is installed in the pipe between the Bristol Diaphragm Valve and the Surge Tank. These filters are of successively smaller equivalent mesh size; beginning at 100 microns and finishing at 1 micron. Two different types of filters are used. The first set, called Sparkler filters, use diatomaceous

Water Disposal (continued)

earth as the filter media. The two Sparkler model SCJ-24-17 filters are cylindrical, horizontally mounted, closed steel containers housing filter discs. These discs are coated with a diatomaceous earth slurry. Water entering the filter container must pass through the filter discs to exit the container. These filters remove particles down to 100 microns diameter. There are no vents or relief valves on the Sparkler filters.

Discharge from the Sparkler filters continues on to a set of 3 GAF cartridge-type filters. These filters are enclosed in cylindrical, vertically mounted, closed steel containers. These filters have successively smaller mesh sizes; a 4 pac unit at 50 microns, a 2 pac unit at 5 microns, and a 1 pac unit at 1 micron. There are no vents or relief valves on the GAF filters.

Discharge from the cartridge filters flows to the Surge Tank. This tank is used to assure an adequate supply of water for the injection pump. The Surge Tank is vented inside the building. The purpose of the vent is to equalize tank pressure as the water level rises and falls.

Should an overflow occur, water would flow through the overflow pipe to the WW Building trench (see Leakage, below).

All the elements of this disposal system from the final cooler water main to the injection pump are connected by schedule 40 steel piping. The filter units are closed steel containers. Schedule 80 steel pipe is used between the injection pump and the well head.

Filter Media

The filter media in both Sparkler and GAF filters must be regularly changed. The filters become blinded with Naphthalene particles. Because Naphthalene is a carbon compound, it is returned to the coking process; the original process from which it is generated.

Leakage

The entire filter process is contained within the walls of the WW Building. Should leaks occur they would flow into a concrete-lined trench connecting the WW Building with the pitch pit at the flush liquor decanters. All leaked or vented material is returned to the coking process at the flush liquor system.

September 24, 1986



CENTRAL LABORATORY

page 1 of 2

LABORATORY INVESTIGATION REPORT

Number 601850

April 25, 1986

To:

T. Weber

Subject:

Wastewater

Specification: Not Provided

Supplier: Rouge Environmental Services (RES)

Object:

Analyze the submitted water sample for the tests listed in the test data for information.

SAMPLES/DATA RECEIVED:

The Sample was collected from "Deep Well" by C. Ozar (RES) on

April 22, 1986 for permit requirement.

Test Data:

Tests	Results	<u>Date</u> Analyzed	Analyst
pH (EPA-600/4-79-020, M 150.1)	7.3	4/22/86	C. Ozar (RES)
Specific Gravity (Paar densitymeter)	1.000	4/22/86	D. Lopes
Benzene, mg/L Naphthalene, mg/L (Extraction with methylene chloride as B/ then Gas Chromatograph/Mass Spectrometer)	28 20 N,	4 22/86 4/22/86	D. Lopes D. Lopes
Phenols ^a , mg/L (EPA-600/4-79-020, M 420.1)	928	2/23/86	D. Lopes
Cyanide ^a , mg/L (EPA-600/4-79-020, M 335.1&2)	277	4/23/86	Barry Schigelone
Total Suspended Solids, mg/L (EPA-600/4-79-020, M 160.2)	7	4/23/86	Barry Schigelone
Residual Chlorine, ppm (Hach portable chlorine tester)	none detected	4/22/86	D. Lopes
Sulfur (Total), mg/L (Inductively Coupled Plasma Emission Spectroscopy)	187	4/24/86	R. O'Donnell



CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

TEST DATA: (continued)

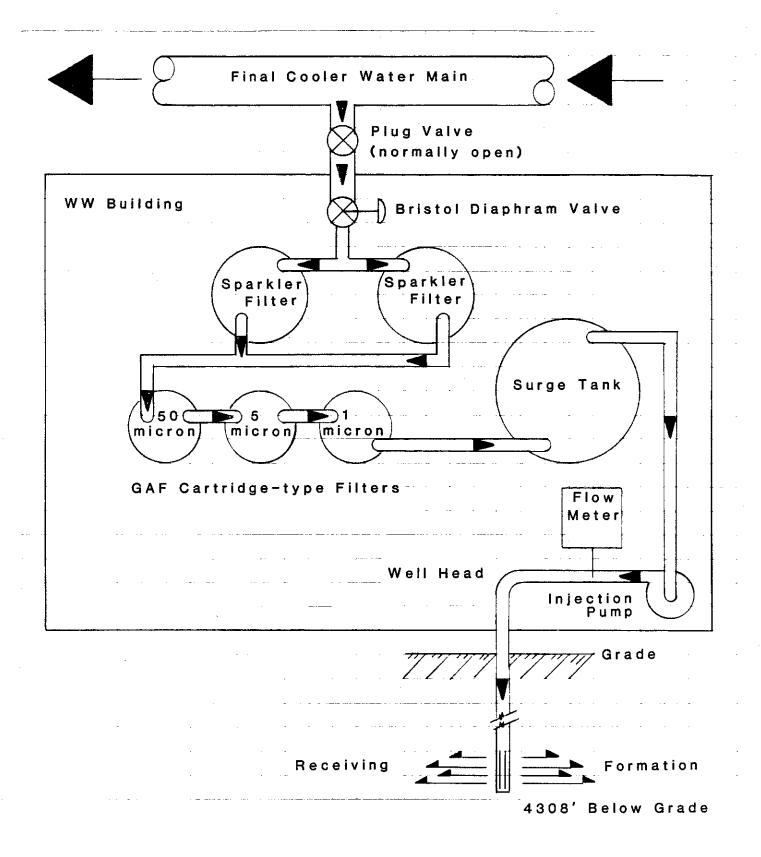
<u>Tests</u>	Results	<u>Date</u> Analyzed	Analyst
Sulfide, mg/L (EPA-600/4-79-020, M 376.2; 0.02N Sodium thiosulfate)	42	4/23/86	D. Lopes
Chloride, mg/L (Ion Chromatograph)	2.7	4/25/86	Monica Drouillard

The sample was preserved by adding sodium hydroxide (pH > 12) and sulfuric acid (pH < 4) for cyanide and phenols measurements respectively.

Laboratory Specialist Environmental Section Chemistry Department

dpl/DPL

Deep Well Injection Facility Schematic





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604.

REPLY TO THE ATTENTION OF:

3 1 OCT 1986

Peter J. Sherry, Jr.
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121-1699

RE: Rouge Steel Company
Docket No. V-W-86-R-61

Dear Mr. Sherry:

After having reviewed the material that Rouge Steel Company has submitted and the points that were made during our informal settlement conference, the United States Environmental Protection Agency (U.S. EPA) has several other areas where additional information is needed. Therefore, this letter comes as an informal discovery request for that information. Under 40 CFR §22.19(f)(1) discovery in these administrative proceedings is to take place only after certain determinations are made by the Presiding Officer. We are willing to make a motion to the Presiding Officer for those determinations, but I thought we could more efficiently handle this discovery voluntarily, and avoid the need for such a motion. If any of the attached informal discovery requests presents particular problems for Rouge, please contact me to discuss this further. I made be reached at (312) 886-6595.

Very truly yours,

Roger Grimes Counsel for Complainant

Attachment

Informal Discovery Requests

Rouge Steel Company, Docket No. V-W-86-R-61

- Produce all construction specifications including plans, drawings, blueprints and the like which document how the alleged surface impoundment in this matter was constructed. Include specifications showing all materials used in such construction.
- 2. Produce all records documenting any informal or formal agreements or contracts entered into between Rouge Steel Company and Wayne Disposal, Inc. (or any other waste disposal facility) regarding the acceptance for disposal of the K087 waste stream since November, 1980.
- 3. Produce all records of analysis performed on the Rouge K087 (tar decanter sludge) waste stream since November, 1980. These records should include, but are not limited to, records of analysis conducted by or on behalf of Rouge Steel Company, Wayne Disposal, Inc. or any other party. In particular, any results of the Paint Filter Liquids Test, Method 9095, as described in "Test Methods for Evaluating Solid Wastes, Physical-Chemical Methods" (EPA Publication No. SW-846) referenced in 40 CFR 265.314.
- 4. Describe in detail the methods and procedures employed in the operation of adding coke breeze to the K087 waste stream, including quantities of wastes mixed, ratio of waste to coke breeze, methods of mixing and handling, and the like.
- 5. Describe in detail the purpose or purposes for adding coke breeze to the KO87 waste stream. Describe any physical or chemical properties imparted to the waste because of such addition of coke breeze.

Does the addition of coke breeze serve in any way to increase or decrease the amount of free liquids, if any, in the waste?

- 6. Describe in detail the construction of the surge tank related to your UIC filtration system; specifically, how it is vented to the atmosphere, any air pollution control relating to that venting, the containment system for overflow from the surge tank or any other leakage from the filtration system. Produce documents such as flow diagrams showing how any leaks from the filtration system would be contained in a concrete lined trench connected to the "pitch pit".
- 7. Describe in detail the means by which the filtration treatment system is "directly connected" to the coke production process (i.e. how the final cooler water is generated from the process). Describe in detail the operation of the gas cooling system and include a description of its purpose.
- 8. Does the gas cooling system in any way serve to control air pollution? If so, describe in detail.
- 9. Produce a documents such as flow diagrams or the like which show the treatment system from the point of cooling water generation at the coke production operation through the filtration system.

Respectfully submitted,

Date

Roger Grimes

Counsel for Complainant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

OOT 23 1986

REGIONAL HEARING CLERK U.S. ENVIRONMENTAL PROTECTION AGENCY

DOCKET NO. RCRA V-W-86-R-61

cc: Lodino

IN THE MATTER OF:

ROUGE STEEL COMPANY,

)

by my letter dated September 19, 1986.

RES PONDENT

ORDER GRANTING RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO FILE PREHEARING EXCHANGE

COMES NOW Respondent, Rouge Steel Company, and presents its Unopposed Motion for Extension of Time in which to file the preharing data as directed

Said Motion states that Complainant does not oppose the extension of time until and including November 26, 1986.

In the premises, I find that said extension should be and it is hereby granted. The time for each party to file the names of its witnesses, a narrative of each witness's expected testimony, along with the exhibits which will be identified or offered at the hearing is hereby extended to and including November 26, 1986.

SO ORDERED.

DATED: October 27, 1986

Marvin E. Jones

Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the Original of the foregoing ORDER GRANTING RESPONDENT'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE PREHEARING EXCHANGE was mailed, via Certified Mail, Return Receipt Requested, to Ms. Beverly Shorty (5-MFA-14), Regional Hearing Clerk, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604; that a True and Correct Copy was forwarded in the same manner and to the same address to Counsel for Complainant, Roger Grimes, Office of Regional Counsel, and a True and Correct Copy was forwarded in the same manner, Counsel for Respondent:

Peter J. Sherry, Jr, Esquire Rouge Steel Company 3001 Miller Road Post Office Box 1699 Dearborn, Michigan 48121-1699;

all such service effected this 27th day of October, 1986.

Mary Lou Clifton

Secretary to Marvin E. Jones, ADLJ



BEGEIVED

Line - - mag

CHRICE OF REGIONAL COUNSEL

Office of the General Counsel

Ford Motor Company The American Road Dearborn, Michigan 48121

October 9, 1986

VIA FEDERAL EXPRESS

Mr. Roger Grimes
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RCRA Complaint V-W-86-R-61 Rouge Steel Company Dearborn, Michigan

Dear Mr. Grimes:

This is in response to the informal conference held in Chicago, Illinois on August 20, 1986, during which we discussed the subject RCRA complaint (the "Complaint").

The Complaint filed by the EPA covered seven matters. I would like to address them each in turn.

Treatment in a Surface Impoundment Without a Permit or Interim Status: (Proposed Penalty: \$9,500.00). As we discussed in the conference, we believe that the concrete pad, where the coke oven tar sludge was held for the brief interim period before being shipped for disposal, was not a "surface impoundment" as that term is defined in 40 CFR §260.10. First, the concrete pad and coke breeze used to contain the sludge is not a "natural topopgraphic depression, man made excavation, or diked area formed primarily of earthen materials." In fact, if anything, the concrete pad and coke breeze could be more aptly described as a "tank", as that term is defined in 40 CFR §260.10. explained, the pad is solid a concrete approximately 827 feet by 70 feet and is at least 18 inches thick, upon which stood a coke battery until approximately

1935. The coke breeze, a "non-earthen material", was used to form an approximately 30 feet by 30 feet tank on the pad to contain the sludge and thereby provide structural integrity. As a tank, no permit or interim status would be required pursuant to 40 CFR 262.34(a), since the waste was not accumulated on site for more than 90 days.

Second, there was no accumulation of "liquid wastes" or "wastes containing free liquids". Coke oven tar sludge certainly is not a liquid; it is not pumpable nor does it contain free liquids. It was stated that, during an inspection of the facility, an EPA representative saw "liquids" within the tank. As explained below, because of a change in Rouge Steel's method of handling the tar sludge, whereby it is returned to the manufacturing process, neither Rouge Steel nor EPA would be able to demonstrate the composition of whatever "liquid" may have been spotted during the inspection.

Third, we believe that Rouge would not have been engaged in the "treatment" of tar sludge, as the term is defined in 40 CFR §260.10. As we discussed, the tar sludge was mixed with coal breeze to facilitate handling. The purpose was to improve ease of removal from the truck upon its arrival at the disposal facility. The mixing was not done "so as to neutralize such waste, or so as to recover energy or material resources from the waste or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage or reduced in volume." We find nothing in the regulations which cause actions done for material handling ease to be considered "treatment".

We also pointed out during our discussions that all tar sludge has been removed from the concrete slab and the tar sludge is now returned to the original process from which it was generated. Accordingly, the concrete slab and coke breeze has not been used for some time and will no longer be used in the future.

We believe this count should be dismissed. We recognize, however, that certain factual issues exist, the proof of which would be difficult and time consuming given the changed circumstances. We would be willing, therefore, to settle this part of the Complaint for \$2,500.00, without admitting liability, but with the agreement that the actions giving rise to the alleged violation would not be repeated.

(2) Treatment of Reactive Hazardous Waste Without a Permit or Interim Status: (Proposed Penalty: \$2,250.00). This part of the Complaint related to the filtration of final cooler water prior to its injection into a deep well. As we discussed in our conference, we believe the

system by which Rouge Steel filters final cooler water is a "totally enclosed treatment facility" as defined in 40 CFR §260.10. It, therefore, is exempt from RCRA Permit requirements pursuant to 40 CFR §270.1(c)(2)(iv) Attachment I is a description of the deep well filter system used by Rouge Steel. Based on this description, we propose that this count of the Complaint be dropped.

- Failure to Comply With TSD Standards for Treatment in a Surface Impoundment and by Filtering: (Proposed Penalty \$9,500.00). This aspect of the Complaint depends on the resolution of (1) and (2) above. As asserted, the final cooler water filtration system constitutes a totally enclosed treatment facility. We propose, therefore, that the assertion that the filtering failed to comply with TSD standards be dropped. Additionally, and again as asserted above, we believe that the concrete slab was not a surface impoundment, but rather, if anything, a tank. Accordingly, Rouge Steel was not under an obligation to comply with TSD standards. Recognizing the difficult factual issues presented by the surface impoundment issue, we would propose to settle this part of Complaint for \$1,200.00, without admitting liability.
- (4) Failure to Post Required Signs: (Proposed Penalty: \$4,000.00). Strict adherence with the sign posting regulations may not have occurred in that signs may have been removed for construction purposes or had recently been dislodged. Given the fact the Michigan DNR Report characterized that, "... part of this was understandable," in light of ongoing construction and site improvements in the coke oven and by-product area, and that any non-compliance has since been remedied, we propose to settle this aspect of the Complaint for \$750.00.
- Failure to Conduct/Document Waste Analysis to Characterize Solid Waste: (Proposed Penalty: \$4,000.00). In our conference we admitted that at the time of the spirits Michigan DNR inspection, mineral and diatomaceous earth filter media from the final cooling water system may not have been characterized. These characterizations since has been performed. The characterization for filter the media is enclosed It also is important to note that since Attachment II. this material is now being returned to the original process from which the filtrate was generated as an effective substitute for carbon, the filter media and filtrate are not now solid waste. The mineral spirits were determined to be an ignitable waste and were disposed of accordingly. A contract has been established with a recycling vendor to periodically remove and replace mineral spirits from the paint shop. Waste mineral spirits from the paint shop are now handled in such a way that there is essentially no accumulation on site. Any storage of this waste is limited

paintshop

oil?

- Lack of Adequate Personnel Training Records: \$1,000.00). As we (Proposed Penalty: discussed, believe Rouge Steel has maintained adequate personnel The Michigan DNR report does training records. indicate or even suggest that training records inadequate. We enclose for your information, however, the Steel's draft of Rouge new hazardous contingency plan, which incorporates the personnel training program. We propose that this count of the Complaint, be dropped.
- (7) Failure to Prevent Release of Hazardous Waste to Environment: (Proposed Penalty: \$6,500.00). This aspect of the Complaint related to the spillage of an unknown but minor, amount of tar material. We note that the Michigan DNR Report identifies this material as "tar pitch." our view that this material is a product and not a waste and certainly not decanter tar sludge, since it originated in the by-products area of the plant where tar is produced for sale as a raw material. The report indicates that spillage of "tar pitch" spilled from the front of the new decanter tar sludge collection box. This may not be In any event, the front of the box was originally constructed to allow easy access for cleaning. A steel plate has since been welded to the box to close the front of the box, and a deflector belt has been installed on the decanter chute to prevent inadvertent spillage from this system. A vacuum truck is now used to remove tar sludge from the box. As discussed above, the material collected in this box is now returned to the process from which it originated. In view of the fact that the spill was de minimis, that certain factual issues exist concerning the nature of the material and the spill, and that action has been taken to alleviate the chance for future spills from the box, we propose to settle this claim for \$1,000.00.

In summary we would be willing to recommend settlement of this matter on the following basis:

- (a) Rouge Steel would pay to EPA \$6,950.00 full settlement of the Complaint;
- (b) EPA would dismiss the counts in the complaint relating to the surface impoundment, the final cooling water and deep well injection system, and the failure to keep adequate personnel training records; and

(c) Rouge Steel would not be required to submit permit applications or closure plans for the alleged surface impoundment, given that Rouge Steel was not operating a "land treatment facility" subject to RCRA permit or closure requirements.

Please note that in the absence of any assessment by EPA of how the alleged violations fit within EPA's RCRA penalty policy, our settlement amount is based on our perception of the potential for environmental harm and the degree of deviation from the regulatory requirements. Please call me after your further review of this matter to determine if settlement is possible.

Sincerely,

P. J. Shefry, Jr

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ROUGE STEEL COMPANY Coke Oven Operation Filtration Before Deep Well Injection Technical Summary

Background

Rouge Steel Company produces coke from coal for use in its iron-making operations. By-products of coke production are recovered and utilized as various products. One by-product of coking which is not utilized is water. Excess water is blown down from the Naphthalene recovery system and disposed of by injection in an on-site deep well. To make this excess water amenable for deep well disposal, the water must be filtered. Filtration removes small particles of Naphthalene that could plug the deep well receiving geologic formation. Filtration takes place in a series of closed steel containers integrally connected by solid steel piping and integrally connected to an industrial production process. Filtered water is injected in the deep well. Removed material - Naphthalene - and the filter media are returned to the coking process.

Coke Process

Conversion of coal into coke is a distillation process. Coal is heated in the absence of oxygen to form coke (carbon) and a variety of products. By-products are removed from the coke ovens by gas mains as a hot gas. The gas is cooled in the mains by ammonia liquor. This liquor picks up tar, light oils, and ammonia. Partially cooled gas passes through water sprays in the final gas coolers. At this point Naphthalene and moisture from the coal condense out. Naphthalene is distilled from the cooler water/naphthalene/moisture mixture. Condensed moisture must be removed from the final cooler water system to prevent the system from overflowing. Final cooler water blow down is a non-ignitable, non-corrosive, non-volatile waste containing cyanide and sulfide (see Attachment 1).

Water Disposal

The final cooler water level is monitored in the final cooler Sump. When the water rises to a pre-determined level, a sensor transmits a signal to a Bristol controller to open the Bristol Diaphragm Valve (see Attachment 2). The valve remains open until the water level drops to the desired operating level. Final cooler water system blow down is disposed of by deep well injection. If this water is injected as blown down, small Naphthalene particles in the water will blind the receiving formation and fill the well casing.

To make this blow down more amenable for disposal, a set of filters is installed in the pipe between the Bristol Diaphragm Valve and the Surge Tank. These filters are of successively smaller equivalent mesh size; beginning at 100 microns and finishing at 1 micron. Two different types of filters are used. The first set, called Sparkler filters, use diatomaceous

Water Disposal (continued)

earth as the filter media. The two Sparkler model SCJ-24-17 filters are cylindrical, horizontally mounted, closed steel containers housing filter discs. These discs are coated with a diatomaceous earth slurry. Water entering the filter container must pass through the filter discs to exit the container. These filters remove particles down to 100 microns diameter. There are no vents or relief valves on the Sparkler filters.

Discharge from the Sparkler filters continues on to a set of 3 GAF cartridgetype filters. These filters are enclosed in cylindrical, vertically mounted, closed steel containers. These filters have successively smaller mesh sizes; a 4 pac unit at 50 microns, a 2 pac unit at 5 microns, and a 1 pac unit at 1 micron. There are no vents or relief valves on the GAF filters.

Discharge from the cartridge filters flows to the Surge Tank. This tank is used to assure an adequate supply of water for the injection pump. The Surge Tank is vented. Should venting occur, water would flow to the WW Building trench (see Leakage, below).

All the elements of this disposal system from the final cooler water main to the injection pump are connected by schedule 40 steel piping. The filter units are closed steel containers. Schedule 80 steel pipe is used between the injection pump and the well head.

Filter Media

The filter media in both Sparkler and GAF filters must be regularly changed. The filters become blinded with Naphthalene particles. Because Naphthalene is a carbon compound, it is returned to the coking process; the original process from which it is generated.

Leakage

The entire filter process is contained within the walls of the WW Building. Should leaks occur they would flow into a concrete-lined trench connecting the WW Building with the pitch pit at the flush liquor decanters. All leaked or vented material is returned to the coking process at the flush liquor system.

September 24, 1986



CENTRAL LABORATORY

Attachment 1

page 1 of 2

LABORATORY INVESTIGATION REPORT

Number 601850 April 25, 1986

To: T. Weber

Subject:

Wastewater

Specification: Not Provided

Supplier: Rouge Environmental Services (RES)

Object:

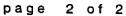
Analyze the submitted water sample for the tests listed in the test data for information.

SAMPLES/DATA RECEIVED:

The Sample was collected from "Deep Well" by C. Ozar (RES) on April 22, 1986 for permit requirement.

Test Data:

<u>Tests</u>	Results	<u>Date</u> Analyzed	Analyst
pH (EPA-600/4-79-020, M 150.1)	7-3	4/22/86	C. Ozar (RES)
Specific Gravity (Paar densitymeter)	1.000	4/22/86	D. Lopes
Benzene, mg/L Naphthalene, mg/L (Extraction with methylene chloride as B/l then Gas Chromatograph/Mass Spectrometer)	28 20 N,	4 22/86 4/22/86	D. Lopes D. Lopes
Phenolsa, mg/L (EPA-600/4-79-020, M 420.1)	928	2/23/86	D. Lopes
Cyanide ^a , mg/L (EPA-600/4-79-020, M 335.1&2)	277	4/23/86	Barry Schigelone
Total Suspended Solids, mg/L (EPA-600/4-79-020, M 160.2)	7	4/23/86	Barry Schigelone
Residual Chlorine, ppm (Hach portable chlorine tester)	none detected	4/22/86	D. Lopes
Sulfur (Total), mg/L (Inductively Coupled Plasma Emission Spectroscopy)	187	4/24/86	R. O'Donnell





CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

TEST DATA: (continued)

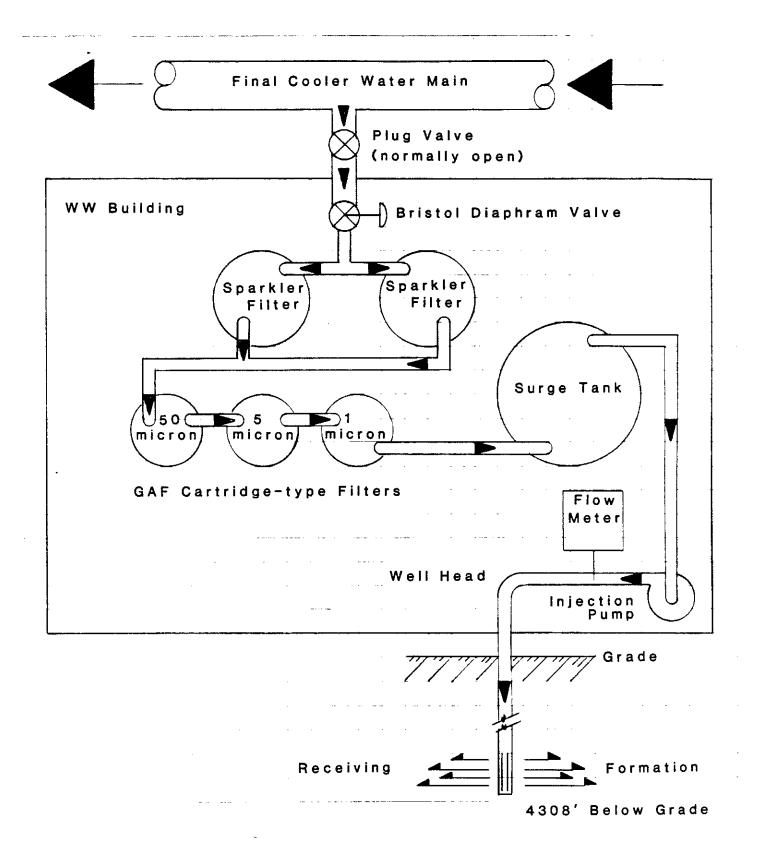
<u>Tests</u>	Results	<u>Date</u> Analyzed	Analyst
Sulfide, mg/L (EPA-600/4-79-020, M 376.2; 0.02N Sodium thiosulfate)	42	4/23/86	D. Lopes
Chloride, mg/L (Ion Chromatograph)	2.7	4/25/86	Monica Drouillard

The sample was preserved by adding sodium hydroxide (pH > 12) and sulfuric acid (pH < 4) for cyanide and phenois measurements respectively.

Laboratory Specialist Environmental Section Chemistry Department

dp1/DPL

Deep Well Injection Facility Schematic



Marvin M. Jones
Administrative Law Judge
Office of Administrative Law
Judges
U.S. EPA
726 Minnesota Avenue
Kansas City, Kansas 66101

PK: Rouge Steel Company Docket No. RCPA-V-W-S6-R-51

Dear Judge Jones:

In accordance with your September 19, 1986 letter, this is intended to report to you the status of the above cited matter. To date, this matter has not been settled. The parties met on August 20, 1986 in Chicago to conduct a settlement conference. At that time a full, cendid, and open discussion of all issues was had, but no resolution was forthcoming. There remains a significant number of disputes as to the facts of this matter as well as to the application of the statute and regulations to those facts. I understand that Respondent is today forwarding a written settlement proposal that may serve to further the continuing settlement negotiations.

Respectfully submitted,

Roger Grimes Counsel for Complainant

oc: Peter J. Sherry, Jr.

Rouge Steel Company

3001 Miller Road

P.O. Box 1699

Dearborn, Michigan 48121-1699

Pegional Hearing Clerk U.S. EPA-Region V 230 S. Dearborn Street Chicago, Illinois 60604

bcc: Laura Lodisio (5HE-12)

SEP DE 66 AM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST.

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604



REPLY TO THE ATTENTION OF

SEP " CARE

RETURN RECEIPT REQUESTED

George Kircos, Senior Attorney Ford Motor Company The American Road Room 554-WHQ Dearborn, Michigan 48121-1899

Re: Rouge Steel Company U.S. EPA ID No. MID 087 738 431

Dear Mr. Kircos:

As discussed in the settlement conference with United States Environmental Protection (U.S. EPA) staff on August 20, 1986, I am enclosing a copy of a regulatory clarification document regarding "totally enclosed treatment facility" pursuant to 40 CFR 260.10(a). This should be helpful to Rouge Steel Company in the preparation of their submittal to demonstrate an exclusion pursuant to 40 CFR 265.1(c)(9).

If you have questions or desire further assistance please contact Roger Grimes at (312) 886-6595 or Laura Lodisio at (312) 886-7090.

Sincerely.

Wm. E. Muno

William E. Muno, Chief RCRA Enforcement Section

TOTALLY ENGLOSED TREATMENT FACILITY

Reculatory Clarification

- I. <u>Issue</u>: From questions asked since promulgation of the regulations on May 19, 1980, it is clear that the definition and practical application of the term "totally enclosed treatment facility" require clarification.
- 11. <u>Discussion:</u> The definition appears in §250.10(a) as
 follows:

Totally enclosed treatment facility means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

A facility meeting this definition is exempted from the requirements of Parts 264 and 265 (See §§264—1(g)(5) and 265.1(c)(9)) and, by extension, the owner or operator of that facility need not notify nor seek a permit for that process. The purpose of this provision is to remove from active regulation those treatment processes which occur in close proximity to the industrial process which generates the waste and which are constructed in such a way that there is little or no potential for escape of pollutants. Such facilities pose negligible risk to human health and the environment.

The pair of the definition which has generated the most uncertainty is the meaning of "totally enclosed." The Agency intends that a "totally enclosed" treatment facility be one which is completely contained on all sides and poses ittle or

no potential for escape of waste to the environment even during periods of process upset. The facility must be constructed so that no predictable potential for overflows, spills, gaseous emissions, etc., can result from malfunction of pumps, valves, etc., associated with the totally enclosed treatment or from a malfunction in the industrial process to which it is connected. Natural calamities or acts of sabotage in the left of total description, by tornadoes, bombing, etc.) are not considered predictable, however.

As a practical matter, the definition limits "totally enclosed treatment facilities" to pipelines, tanks, and, to other chemical, physical, and biological treatment operations which are carried out in tank-like equipment (e.g., stills, distillation columns, or pressure vessels) and which are constructed and operated to prevent discharge of potentially hazardous material to the environment. This requires consideration of the three primary avenues of escape: leakage, spills, and emissions.

To prevent leaking, the tank, pipe, etc., must be made of impermeable materials. The Agency is using the term impermeable in the practical sense to mean no transmission of contained materials in quantities which would be visibly apparent. Further, as with any other treatment process, totally enclosed treatment facilities are subject to natural deterioration (corrosion, etc.) which could ultimately result in leaks. To meet the requirement in the definition that treatment be conducted

waste or any constituent thereof into the environment . . .," the Agency believes that an owner or operator claiming the exemption generally will have to conduct inspections or other discovery activities to detect deterioration and carry out maintenance activities sufficient to remedy it. A tank or pipe which leaks is not a totally enclosed facility. As a result, leaks must be prevented from totally enclosed facilities or the facility is in violation of the regulations.

A totally enclosed facility must be enclosed on all sides. A tank or similar equipment must have a cover which would eliminate gaseous emissions and spills. However, many tanks incorporate vents and relief valves for either operating or emergency reasons. Such vents must be designed to prevent overflows of liquids and emissions of harmful gases and aerosols, where such events might occur through normal operation, equipment failure, or process upset. This can often be accomplished by the use of traps, recycle lines, and sorption columns of various designs to prevent spills and gaseous emissions. If effectively protected by such devices, a vented tank would qualify as a totally enclosed treatment facility.

When considering protective devices for tank vents, the question arises as to whether the protective device is itself adequate. The test involves a judgment as to whether the overflow or gaseous emission passing through the vent will be

prevented from reaching the environment. For example, an open catchment basin for overflows is not satisfactory if the hazardous constituents in the waste may be emitted to the air. Similarly, it may also not be satisfactory if it is only large enough to hold the tank overflow for a brief period before it also overflows. However, even in this situation, alarm systems could be installed to ensure that the capacity of the catchment basin is not exceeded. Where air emissions from vents or relief valves are concerned, if the waste is non-volatile or the emissions cannot contain gases or aerosols which could be hazardous in the atmosphere, then no protective devices necessary. An example might be a pressure relief valve on a tank containing non-volatile waste . Where potentially harmful emissions could occur, then positive steps must be taken. For example, the vent could be connected to an incinerator or process kiln. Alternately, a sorption column might be suitable if emission rates are low, the efficiency of the column approaches 100 percent, and alarms or other safeguards are available so that the upset causing the emission will be rectified before the capacity of the column is exceeded. Scrubbers will normally not be sufficient because of their tendency to malfunction and efficiencies typically do not approach 100 percent.

Tanks sometimes have floating roofs. To be eligible as a totally enclosed facility, such tanks should be constructed so that the roof has a sliding seal on the side which is designed

to prevent gaseous emissions and protect against possible overflow.

The part of the definition requiring that totally encloses treatment facilities be "directly connected to an industrial production process" also generates some uncertainty. As long as the process is integrally connected via pipe to the production process, there is no potential for the waste to be lost. The term "industrial production process" was meant to include only those processes which produce a product, an intermediate, a byproduct, or a material which is used back in the production process. Thus, a totally enclosed treatment operation, integrally connected downstream from a wastewater treatment lagocwould not be eligible for the exemption because the process to which it is connected is not an "industrial production process. Neither would any totally enclosed treatment process at an off site hazardius waste management facility qualify, unless it wer integrally connected via pipeline to the generator's productic process. Obviously, a waste transported by truck or rail i: not integrally connected to the production process.

Hazardous waste treatment is often conducted in a serie of unit operations, each connected by pipe to the other. A long as one end of a treatment train is integrally connected to a production process, and each unit operation is integrally connected to the other, all qualify for the exemption if they mean the requirement of being "totally enclosed." If one unit operation is not "totally enclosed" or is not "integrally connected."

then only unit open lions upstream from that unit would qualify for the exemption. The unit and downstream process would require a permit.

The device connecting the totally enclosed treatment facility to the generating process will normally be a pipe. However, some pipes (e.g., sewers) are constructed with manholes, vents, sumps, and other openings. Pipes with such openings may qualify as totally enclosed only if there is no potential for amissions or overflow of liquids during periods of process upset, or if equipment (sorption columns, catchment basisn, etc.) has been installed to prevent escape of hazardous waste or any potentially hazardous constituent thereof to the environment.

This exemption for totally enclosed treatment facilities applies only to the facility itself. The effluent from that facility may still be regulated. If the waste entering the totally enclosed treatment facility is listed in Subpart D of Part 261, then the effluent from the facility is automatically a hazardous waste and must be treated as such, unless it is "delisted" in accordance with §§260.20 and 260.22. If, on the other hand, the waste entering the totally enclosed treatment facility is hazardous because it meets one of the characteristics described in Subpart C of Part 261, then the effluent waste is a regulated hazardous waste only if the effluent meets one of the characteristics. Since the totally enclosed treatment facility is exempted from the regulatory requirements, it is only the effluents from such processes which are of interest

to the Agency. Thus, whether the waste in a totally enclosed treatment facility must be considered towards the 1000 kg/month small quantity generator limit, depends on whether it is a regulated hazardous waste as it exits the totally enclosed treatment facility.

finally, it is important to note that if the effluents from a totally enclosed treatment facility are discharged to a surface water body (lake or stream) or to a publicly owned treatment works or sewer line connected thereto, then these wastes are not subject to the RCRA hazardous waste controls at all but are, instead, subject to the Clean Water Act and regulations promulgated thereunder (See 45 FR 76075).

III. Resolution: In sum, a "totally enclosed treatment facility" must:

- (a) Be completely contained on all sides.
- (b) Pose negligible potential for escape of constituents .

 to the environment except through natural calamaties

 or acts of sabotage or war.
- (c) Be connected directly by pipeline or similar totally enclosed device to an industrial production process which produces a product, byproduct, intermediate, or a material which is used back in the process.

SUBJECT(S): Clarification of the definition and practical application

of the term "totally enclosed treatment facility" (TETF).

REQUESTER: Mr. Ronald E. Meissen

Senior Environmental Engineer Travenol Laboratories, Inc. Deerfield, Illinois 60015

DATE OF INCOMING CORRESPONDENCE: March 3, 1981

DATE OF RESPONSE: July 27, 1981

SUMMARY OF RESPONSE: The definition of TETF appears in §260.10(a) as follows:

a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

The reason such facilities are exempt from the requirements of Part 264 and 265 is because they pose negligible risk to human health and the environment.

"Totally enclosed" means that the facility is completely contained on all sides and poses little or no potential for escape of waste to the environment, even during periods of process upset. As a practical matter, the definition limits totally enclosed treatment facilities to pipelines, tanks, and to other chemical, physical, and biological treatment operations which are carried out in tank-like equipment (e.g., stills, distillation columns, or pressure vessels) and which are constructed and operated to prevent discharge of potentially hazardous materials to the environment. This required consideration of the three primary avenues of escape: leakage, spills, and emissions.

TETF's must be "directly connected to an industrial production process", i.e., integrally connected via pipe to the product process. The term "industrial production process" was meant to include only those processes which produce a product, an intermediate, a byproduct, or a material which is used back in the production process. Thus, a totally enclosed treatment operation, integrally connected downstream from a wastewater treatment lagoon, would not be eligible for the exemption because the process to which it is connected is not an "industrial production process."

Hazardous waste treatment is often conducted in a series of unit operations, each connected by pipe to the other. As long as one end of a treatment train is integrally connected to a production process, and each unit operation is integrally connected to the

other, all qualify for the exemption, if they meet the requirement of being "totally enclosed." If one unit operation is not "totally enclosed" or is not "integrally connected," then only unit operations upstream from that unit would qualify for the exemption. The non-qualifying unit operation and downstream processes would require a permit.

The exemption for TETF's applies only to the facility itself, the effluent from a TETF may still be regulated. If the waste entering the TETF is listed in Subpart D of Part 261, then the effluent from the facility is automatically a hazardous waste and must be treated as such, unless it is "delisted" in accordance with §§260.20 and 260.22. If the waste entering the TETF is hazardous because it meets one of the characteristics described in Subpart C of Part 261, then the effluent is a regulated hazardous waste only if it meets one of the characteristics.

Finally, if the effluents from a TEFT are discharged to a surface water body (e.g., lake or stream) or to a publicly owned treatment works or sewer line connected thereto, then these wastes are subject only to the Clean Water Act and regulations promulgated thereunder, and are not subject to RCRA hazardous waste controls.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 JTH DEARBORN :

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: 5HE-12

JUL 2 2 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sidney Kelly Registered Agent for Rouge Steel Company Subsidiary of Ford Motor Company The American Road Dearborn, Michigan 48121

Re: Complaint, Findings

of Violation and Compliance Order EPA I.D. No: MID 087 738 431

Dear Mr. Kelly:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Rouge Steel Company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on inspections conducted by the Michigan Department of Natural Resources and other information obtained from our files regarding your facility located at 3001 Miller Road, Dearborn, Michigan. The findings in the Complaint state the reasons for such a determination. In essence, the facility violated regulations applicable to generators and owners and operators of hazardous waste treatment, storage and disposal facilities.

Accompanying the Complaint is a Notice of Opportunity for Hearing and a copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation or Suspension of Permits". Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverely Shorty, Regional Hearing Clerk (5MF-14) at the United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from receipt of this Complaint. A copy of your request should also be sent to Roger Grimes, Office of Regional Counsel (5C-16) at the same address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions, or desire to request an informal conference for the purpose of settlement, please contact Laura Lodisio, Hazardous Waste Enforcement Branch, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.
Ms. Lodisio may be reached at (312) 886-7090.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosures

cc: Del Rector, Chief
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Mr. Benedict Okwumabua MDNR - Hazardous Waste Division 15500 Sheldon Road Northville, Michigan 48167

Mr. P.T. Sullivan
Rouge Steel Company # 300 532 348
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121

bcc: Robert Small, OWPE (WH-527)

Roger Grimes, ORC (5C-16)

Denise Reape (5HE-12)

Regional Hearing Clerk (5MF-14)

Michigan Permit Unit (5HS-13)

5HE-12:LLODISIO:bphillips:6-7090:5-23-86

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Sincerely.

Basil G. Constantelos, Director

Waste Management Division

Enclosures

cc: Del Rector, Chief Hazardous Waste Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

> Mr. Benedict Okwumabua MDNR - Hazardous Waste Division 15500 Sheldon Road Northville, Michigan 48167

Mr. P.T. Sullivan Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, Michigan 48121

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

IN THE MATTER OF

DOCKET NO.

V-W- 88 R-61

ROUGE STEEL COMPANY 3001 MILLER ROAD DEARBORN, MICHIGAN 49504 COMPLAINT, FINDINGS
OF VIOLATION AND COMPLIANCE ORDER

EPA I.D. No: MID 087 738 431

COMPLAINT

JUL 20 1986 J

This Complaint is filed pursuant to Section 3008(a)(1) of the Resolution Arrivation and Recovery Act of 1976, as amended (RCRA or the PART CTADNUASENCY §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Rouge Steel Company, 3001 Miller Road, Dearborn, Michigan.

This Complaint is based on inspections conducted by the Michigan Department of Natural Resources (MDNR), as an authorized representative of the U.S. EPA, and the other information contained in U.S. EPA files concerning this facility.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information above, it has been determined that Respondent is in violation of 42 U.S.C. Sections 6922, 6924, and 6925, and regulations promulgated thereunder, in that Respondent has failed to comply with certain standards applicable to generators and owners and operators of hazardous waste treatment, storage and disposal

facilities. Specifically, Respondent has been determined to be in violation of regulations 40 CFR 262.34, 262.40, 265 Subparts A, B, C, D, E, F, G, H, K and Q and Part 270.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), and 3008 of RCRA, 42 U.S.C. $\S6912(a)(1)$, and $\S6928$ respectively.

FINDINGS AND DETERMINATIONS

This determination of violation is based on the following:

- 1. Respondent, Rouge Steel Company, is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15) who owns and operates a facility located at 3001 Miller Road, Dearborn, Michigan 48121 that generates, treats and disposes of hazardous waste. The Respondent is a wholly owned subsidiary of Ford Motor Company, a Michigan Corporation whose registered agent is Mr. Sidney Kelly, The American Road, Dearborn, Michigan.
- 2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste or owns or operates a facility for the treatment, storage or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 also provides that no hazardous waste subject to regulation may be transported, treated, stored, or disposed of unless the required notification has been given.
- U.S. EPA first published regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980.

These regulations are codified at 40 CFR Parts 260 through 265.

Notification to U.S. EPA of hazardous waste handling was required in most instances no later than August 18, 1980.

- 4. On August 11, 1980, Respondent submitted to U.S. EPA a Notification of Hazardous Waste Activity indicating that the facility generates, treats, stores, or disposes of U.S. EPA hazardous wastes Nos. F001, F016, K060, K061, K062, K087, U002, U226, D001 (Ignitable), D003 (Reactive) and D000 (Toxic). The name of the installation stated on the Notification was Ford Motor Company Steel Division. On March 24, 1982, Respondent submitted a letter to U.S. EPA stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, a wholly owned subsidiary.
- 5. Section 3005(a) of RCRA, 42 U.S.C. §6925, requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.
- 6. Regulation 40 CFR 270.10(e) requires owners and operators of existing hazardous waste management facilities to submit Part A of their RCRA permit application to the Regional Administrator no later than (i) 6 months after the date of the publication of regulations which first require them to comply with the standards set forth in 40 CFR Parts

265 or 266, or (ii) thirty days after the date they first become subject to the standards set forth in 40 CFR Parts 265 or 266, whichever occurs first.

- 7. Section 3005(e) of RCRA, 42 U.S.C. §6925(e), provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application provided that: (1) the facility was in existence on November 19, 1980, (2) the requirements of Section 3010(a) of RCRA concerning the notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.
- 8. On November 17, 1980, Respondent submitted to U.S. EPA Part A of their RCRA permit application for disposal of hazardous waste in underground injection wells. The waste type included in the Part A was identified as EPA Hazardous Waste No. D003. On March 26, 1982, Respondent submitted a revised Part A General Information form stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, and that all other information remained the same.
- 9. As defined in 40 CFR 260.10 "treatment" means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous,

or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

- 10. As defined in 40 CFR 260.10 "surface impoundment" or "impoundment" means a facility or part of a facility which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.
- 11. On March 14, 1986, a RCRA compliance inspection was conducted by the Michigan Department of Natural Resources (MDNR) as an authorized representative of the U.S. EPA. At the time of this inspection it was determined that a hazardous waste management unit at Respondent's facility is a man-made diked excavation which was designed to hold an accumulation of wastes containing free liquids. Specifically, the surface impoundment is used to treat, by solidification, decanter tar sludge from coking operations (U.S. EPA hazardous waste No. K087).
- 12. At the time of the RCRA compliance inspection on March 14, 1986, it was further determined that Respondent treats by filtration, hazardous waste identified as EPA Hazardous Waste No. D003 prior to disposal in an underground injection well.
- 13. Based on Findings 9 through 12 above, U.S. EPA has determined that
 Respondent owns and operates a surface impoundment for the treatment of
 hazardous wastes and conducts other hazardous waste treatment and is,
 therefore, subject to all applicable requirements of 40 CFR Part 265,

- Subparts A, B, C, D, E, F, G, H, K and Q and the permit requirements of 40 CFR Part 270.
- 14. Pursuant to requirements of the Hazardous and Solid Waste Amendments of 1984, Section 213, 40 CFR 270.73(c). if granted interim status under Section 3005 of RCRA, a facility must submit a completed Part B permit application and certification of compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, to avoid losing interim status on all surface impoundments. If a Part B permit application and certification of compliance is not received by November 8, 1985, the owner or operator must submit a closure plan, stating his intent to close the facility, to the Regional Administrator no later than 15 days after termination of interim status as required by 40 CFR 265.112(c).
- 15. On November 4, 1985, U.S. EPA received a letter from Respondent certifying that the No. 2 deep well at the facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements of RCRA.
- 16. Based on information in the U.S. EPA files, as of November 8, 1985, Respondent failed to submit Part B of the permit application and certify compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, as required by Section 3005(e) of RCRA for the hazardous waste surface impoundment. RCRA regulated land disposal units that fail to meet the requirements of Section 3005(e) lose interim status and must immediately cease operation and comply with applicable closure requirements.

- 17. In a letter dated January 23, 1985, MDNR, as a representative of the U.S. EPA, requested that Respondent submit facility closure and post-closure plans for review. The purpose of this review was to evaluate compliance of the plans with 40 CFR 265 Subpart G. No closure plan was submitted from Respondent in response to this MDNR request.
- 18. In a letter dated March 29, 1985, U.S. EPA requested that the Respondent provide the agency with a copy of their closure plan because they had failed to submit it to MDNR. In response to this request, Respondent indicated that the facility only disposes of hazardous waste via underground injection and therefore was excluded from the closure requirements of 40 CFR 265 Subpart G.
- 19. Based on Finding 18 above, U.S. EPA determined that Respondent's facility was subject to the requirements of 40 CFR 265 Subpart R which provides that the owner/operator of a facility which only disposes of hazardous waste by underground injection is not subject to the requirements of 40 CFR Subpart G. This was acknowledged in a letter from U.S. EPA to Respondent dated April 22, 1985.
- 20. On March 14, 1986, the Michigan Department of Natural Resources conducted a RCRA inspection of Respondent's facility and observed the following additional violations:
 - a) The provisions of 40 CFR 265.13 require that before an owner or operator treats, stores or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all information which must be known to treat, store,

or dispose of the waste in accordance with the requirements of 40 CFR Part 265. At the time of the MDNR inspection on March 14, 1986, Respondent could not document that waste analysis had been obtained on all wastes which were generated at the facility. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

- b) The provisions of 40 CFR 262.34(a) and 265.14(c) require that signs with specific labelling or legends must be posted to each entrance to the active portions of a treatment, storage and disposal facility and at other locations, in sufficient numbers to be seen from any approach to the active portion as well as on storage tanks and containers of generated hazardous waste. At the time of the MDNR inspection on March 14, 1986, appropriate "Danger" and "Hazardous Waste" signs were not posted at some of the hazardous waste treatment and storage areas.
- c) The provisions of 40 CFR 265.31 require that facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. At the time of the MDNR inspection on March 14, 1986, hazardous waste (tar decanter sludge; EPA hazardous waste No. K087) was observed to be spilled on the ground without remedial action to correct the violation. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

- d) The provisions of 40 CFR 265.16(d) require that the owner or operator must maintain personnel training documents and records at the facility. At the time of the MDNR inspection on October 17, 1985, Respondent could not produce adequate records of training. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.
- 21. The violations cited in Finding 20, above were documented in a letter from MDNR to Respondent on April 15, 1986.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

- A. Respondent shall immediately upon this Order becoming final cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste generators and the standards for treatment, storage, and disposal facilities except as provided for in Paragraphs B through E below.
- B. Within 15 days of this Order becoming final, Respondent shall submit a closure plan to the Regional Administrator of the U.S. EPA, stating intent to close the surface impoundment. The closure plan shall meet all the requirements of 40 CFR 265 Subpart G, 40 CFR 265.228, and the permit requirements of 40 CFR 270.1(c). The closure plan must also provide for compliance with the requirements of 40 CFR 265 Subpart F. Groundwater Monitoring.

- C. Within 15 days of this Order becoming final, Respondent shall submit to U.S. EPA a revised Part A application for a RCRA permit for treatment and disposal of hazardous waste in accordance with 40 CFR Part 270. Respondent's Part A application, when received, shall be accepted as if timely filed.
- D. Within 30 days of this Order becoming final, Respondent shall comply with all applicable requirements of 40 CFR 265 Subparts A, B, C, D, E, G, H and Q regarding the treatment of reactive hazardous waste (U.S. EPA Waste No. D003).
- E. Within 30 days of this Order becoming final Respondent shall provide U.S. EPA with the following:
 - Documentation that waste analysis has been obtained on all solid wastes generated at the facility pursuant to the requirements of 40 CFR 265.13.
 - 2) Documentation that the appropriate signs have been posted at all hazardous waste treatment and storage areas pursuant to the requirements of 40 CFR 262.34 (a)(3) and 265.14(c).
 - 3) Documentation that the facility is maintained and operated to minimize the possibility of a fire, explosion or any sudden or non-sudden release of hazardous waste or waste constituents to air, soil or surface water which could threaten human health and environment and that remedial action has been taken to clean up all spills of hazardous waste pursuant to 40 CFR 265.31.
 - 4) Copies of personnel training records which document compliance to the requirements of 40 CFR 265.16(d).

F. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Laura Lodisio, RCRA Enforcement Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to:

Mr. Benedict Okwumabua Michigan Department of Natural Resources Hazardous Waste Division 15500 Sheldon Road Northville, Michigan 48167

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of THIRTY-SIX THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS (\$36,750) against the Respondent, Rouge Steel Company, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the

payment shall be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator you must file a written Answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your Answer and any subsequent documents filed in this action should be sent to Roger Grimes, Assistant Regional Counsel, at the same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your Answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said Answer should contain: (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above: (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Ms. Laura Lodisio, RCRA Enforcement Section (5HE-12), at the address cited above, or by calling her at (312) 886-7090.

		21 st				
Dated	this	X1	day	of	Tuly,	1986.
						

Waste Management Division

Complainant

U.S. Environmental Protection Agency

Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Mr. Sidney Kelly Registered Agent for Rouge Steel Company Subsidiary of Ford Motor Company The American Road Dearborn, MI 48121

and

P.T. Sullivan, President Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, MI 48121

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, at 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this	22	day of	July	, 1986.
			0 ()	

Enforcement Branch

U.S. EPA. Region V

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON
ARLENE J. FLUHARTY
ROON E. GUYER
...ERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

Gorden E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

July 15, 1986

Mr. Gerald Doroshewitz Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, MI 48121

RE: MID 087738431

Dear Mr. Doroshewitz:

This letter is to acknowledge receipt of your response dated May 15, 1986, indicating your compliance program for RCRA deficiencies cited during staff inspection on March 14, 1986.

As you may be aware, a referral for escalated enforcement has been sent to U.S. EPA, Region V. Your letter has been referred to them. If you have any questions regarding this matter, please contact Laura Lodisio with the U.S. EPA, Region V at (312) 886-7090.

Sincerely,

Lynne King

Hazardous Waste Division

LK/aw

cc: B. Okwumabua Laura Lodisio, U.S. EPA, Region V U.S. EPA, Region V



3001 Miller Road P. O. Box 1699 Dearborn, Michigan 48121-1699

May 15, 1986

Ms. Margaret A. Field's
Department of Natural Resources
S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

MAY 19 1935

Subject: MID 087738431 RCRA Inspection March 14, 1986

WATER QUALITY DIV.

Dear Ms. Field's:

Mr. P. T. Sullivan has asked me to respond to your letter dated April 15, 1986, concerning your visit to the Rouge Steel Company on March 14, 1986. The items identified in your letter are addressed in order as follows:

1. Containerized solvents were being reclaimed by Safety-Kleen Corp., and manifested properly. As you know, the EPA revised and broadened its regulation effective July 5, 1985, to include recycled and reclaimed solvents. The waste characterization for the solvent material to be reclaimed, as required by 40 CFR 262.11, has been completed and will be included as part of the "Hazardous Materials Spill Control And Counter Measure Plan" (HMSCCMP) to be revised no later than August 1, 1986, which will also include the Safety-Kleen Corp. equipment used in the plant.

The waste mineral spirits you refer to were inadvertantly placed in the cold rolling mill oil yard. These materials result from the cleaning of brushes, rollers, and other related painting equipment. To avoid future handling problems, Safety-Kleen Corp. has been contracted to provide cleaning equipment and to remove the solvent for reclamation (installed on May 14, 1986, copy of order included).

Since your visit, we have determined that the "drums of scrap oil" referenced in your letter were surplus virgin oils placed in the cold rolling mill oil yard by the Cold Mill Maintenance Department, which no longer uses these particular oils. These oils are being retained for usage in other departments. Our review of the material safety data sheets for the identified oils indicates that even if they were to be disposed of in the future, they would be non-hazardous under current regulations. These drums were labeled "scrap" because the Maintenance Department no longer had use for the oil, and to avoid confusing these materials with products which they continue to use. All of the empty drums have been removed from the yard for disposal.

The waste characterization for the material resulting from the filter system used prior to injection of the final cooler water into the deep-well will be completed after laboratory results are obtained. If the waste is characterized as hazardous, the characterization will also be included as part of the HMSCCMP. In the meantime, these wastes are assumed to be hazardous per 40 CFR 262.11 (c) (2) and are disposed of with the tar decanter sludge. This is a continuation of past practice.

2. We disagree with your assertion that the facility has repeatedly failed to post signs. As noted in your letter, the sign at the Electric Arc Furnace had fallen to the ground. The sign has been replaced with two signs (with improved corrosion protection) at both the east and west approaches to the flue dust process silo. A new sign has also been placed on the new tar decanter collection box. Construction of the other new tar decanter is continuing, and is expected to be complete by mid-June, 1986. In the interim, the sign at the old decanter (still in service) has been replaced.

Your reference to the "gas line drip oil/muck oil storage tanks" apparently refers to two different types of materials. There are several tanks used to collect condensate, known as "gas line drips", from the coke oven gas distribution system. These tanks are labeled "Hazardous Waste", where appropriate, but due to the secondary containment around the tanks, the labels may not be readily observed from a passing automobile. Additional signs have now been fastened to the dikes surrounding these tanks. line drips" consist primarily of water containing small amounts of cyanide. Ford Motor Company Central Laboratory has been equipped to analyze this material in accordance with the "Test Method to Determining Hydrogen Cyanide Released from Wastes" as described in a USEPA memorandum from Eileen Claussen, Director, Characterization and Assessment Division, dated July 12, 1985. The test for total available cyanide and total available sulfide will be conducted during the week of May 12, 1986, to determine if the "gas line drips" could be considered a non-hazardous waste. The other tanks referred to are the light oil muck tanks used approximately once in every two month period, when cleaning the oil decanters. The light oil muck is removed from these tanks within a few days after collection. Signs have been posted on these tanks.

3. "Tar pitch" is a product sold by the plant to Allied Chemical for further processing for ultimate use, among other things, as a wood preservative, roofing material, and for electrode manufacturing. The tar pitch observed in the vicinity of the tar decanter construction area and the nearby non-hazardous refuse area is not "tar decanter sludge", and it is not a listed or characteristic hazardous waste. It is normal, but not required practice, to dispose of any tar pitch spillage with the tar decanter sludge.

The front of the new tar decanter sludge collection box was originally constructed to allow easy access for cleaning. A new steel plate has been welded to the box to close the front of the box, and a deflector belt installed on the decanter chute to prevent inadvertant spillage. The material collected in this box is now charged back to the coke ovens.

The spillage in front of this box purportedly occurred when material was removed from the box with a front end loader the previous week. Since the installation of the front plate, a suction truck is used to remove the sludge from the box, which should eliminate spillage.

We disagree with your assessment that the training failed to meet the minimum requirements of 40 CFR 265.16 (a)(3), pertaining to proper everyday handling and emergency procedures. We do agree that training did not specifically address the hazards of the material. This is not, however, a requirement of 40 CFR 265.16. It is currently being generally addressed by required OSHA training under the "Hazard Communication" (HAZCOM) program for all Rouge Steel Company employees.

We will revise our hazardous waste training program to include HAZCOM type of training for specific hazardous wastes. We expect to complete preparation of training materials by August 1, 1986. Hazardous waste onthe-job training for affected personnel was most recently completed during the period from May 1985, to March 1986. Copies of the signature sheets from those training sessions are included. Affected personnel will be retrained using the new program. We expect to complete the new round of training by October 1, 1986.

As discussed in Paragraph 3 above, tar pitch is not a hazardous waste and not subject to RCRA Regulations. Furthermore, neither RCRA nor OSHA require use of respirators in the tar pitch area. Respirators are available to employees who desire to use them.

5. In your letter of April 15, 1986, you stated that this area appeared to be on unprotected soil and could only be described as a lagoon operated in violation of RCRA Regulations. We disagree and assert that, although some material may have been temporarily placed on top of part of the area, there is a continuous concrete pad that extends throughout the entire area. As a result of the concrete pad, there was no risk of any release to the environment. In any event, the use of the concrete pad has been discontinued.

As stated in the Rouge Steel letter of March 26, 1986, the material from the area was removed down to the concrete pad, between March 20 and March 24, 1986. Fourteen truck loads were transported to Wayne Disposal. Copies of the shipping documents and manifests are included with this letter.

As you recommended, we did explore the possibility of handling the tar decanter sludge as a waste for treatment at Michigan Disposal and eventual disposition at the Wayne Disposal Landfill. However, Michigan Disposal is not licensed to treat K087. In fact, there is currently no facility in Michigan, other than Wayne Disposal, that is actively either treating or disposing of tar decanter sludge. For your information, we are now recharging this material along with the coal into the coke oven batteries, as is the practice at other coke plants.

being retained for only one year, when in fact, all three shipping locations have been retaining the manifests since the advent of RCRA. This impression may have been caused by the fact that prior to early 1984, all of our waste pickle liquor (WPL) was being reused in the City of Detroit Sewage Treatment Plant for waste water treatment and was exempted from manifesting as a hazardous waste. Also, a change in transporters used to move the WPL occurred. No manifests were generated for the new vendor before he began operations at our plant, and therefore, none would appear in his file and none would be available for review. In keeping with Company policy on records retention, a procedure has been initiated for retaining the manifests for a three year period as required by 40 CFR 262.40.

In your letter of April 15, you stated that the file summary discloses that with each inspection, the regulated portion of the facility is expanded, and that more frequent inspections are recommended. We disagree with your conclusion and with your recommendation. Pages 2 and 3 of the file summary suggest you believe that the Company failed to identify itself as a waste generator during prior inspections of the "facility." It is clear from the file summary and our own information, however, that these inspections covered only the hazardous waste disposal wells, and that references to "facility" included only the area of the wells. The MDNR inspector for the first and second inspections was informed that Rouge Steel Company both generated and shipped other wastes off-site. The inspector was also shown the waste characterizations which included all the wastes generated throughout the Rouge complex under the control of Rouge Steel Company (formerly Ford Steel Division). The inspector's reaction, at the time, was that the only interest was in the deep-wells. Page 1 of the summary reflects that proper and appropriate notifications for other wastes at the Rouge Complex were made to EPA, and that both waste characterization reports and hazardous waste manifests for these wastes were submitted to the MDNR.

We have no objection to inspections of Rouge Steel Company as provided by applicable federal/state hazardous waste management regulations. We do not believe, however, that past inspections reflect a need for more frequent inspections.

Very truly yours,
I Porodewitz

G. Doroshewitz, Manager/

Environmental Engineering Department

cc: J. Amber

A. Howard

L. Lodisio

B. Okwumabua

P. Sullivan

H. Weinberg

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON .ENE J. FLUHARTY HEN V. MONSMA C. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

April 15, 1986

Mr. P.T. Sullivan, President Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, MI 48121

RE: MID 087738431

Dear Mr. Doroshewitz:

On March 14, 1986, acting as a representative of the United States Environmental Protection Agency, I and Laura Lodisio of USEPA, performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. 40 CFR 262.11. This section requires generators to evaluate all wastes to determine whether they are hazardous. Once evaluated to be hazardous these wastes must be labeled, dated, stored, included in a contingency plan and personnel training, etc.

The only waste evaluation available was for the sites bulk wastes and the listed trichloroethane solvent. During the inspection the company representatives stated that they did not have any containerized hazardous waste. It was later determined that the site had parts cleaners in the powerhouse, and other areas, including one that properly manifested a Safety Kleen mineral spirits operations waste. The site also had four drums labeled mineral spirits which appeared to be waste because of condition and if so would be a flammable hazardous waste. These were reportedly from the site's paint shop. Until these had been observed there had been no mention of any paint shop which would be expected to also generate listed hazardous solvents and other hazardous wastes. The site also had over fifty drums of scrap oil in storage. There was no record of the facility ever identifying these various waste streams, evaluating them, etc.

Page 2 Mr. P.T. Sullivan, President Rouge Steel Co., Dearborn, MI RE: MID 087738431

The site also had two filter systems in use on the hazardous waste cooling waters prior to injection. The diatomaceous earth/sand and fabric filter mediums were being disposed of as non-hazardous, yet there was no waste evaluation available.

2. 40 CFR 262.34(a), 265.14(c),265.17(a). These sections refer to various signs required to be posted.

The site has repeatedly failed to provide the required signs. After the 1984 inspection it was addressed at the coal tar pitch and the electric During this inspection none of these areas had furnace dust areas. the required signs. However, part of this was understandable. The sign on the electric furnace dust storage had fallen on the ground and had not been replaced. It should be noted that even when in place, the sign would not be seen by a truck driver during approach or pickup of the waste. The tar pitch area had been under construction for approximately four months. The new tar pitch decanter had been in use during this period and was not marked. The old tar pitch areas (north and south) had signs posted after the 1984 inspection. No signs were posted at the time of , this inspection. However, it was thought they had been removed with the construction work on the south tar pit, during the past four months. An area overlooked during this inspection was the gas line drip oil/muck oil storage tanks. If these are hazardous waste storage tanks they also need the appropriate signs.

3. /40 CFR 265.31. This section states that facilities "must be maintained and operated to minimize the possibility of . . . any unplanned sudden or non sudden release of hazardous waste . . ."

During 1984 RCRA inspection, the facility was cited for tar pitch spillage in the loading area. The facility reported cleaning this up and said the area would be maintained.

During this inspection there was tar pitch spillage observed in the construction area which may or may not be expected. What wasn't acceptable was spillage around the recently installed tar pitch decanter. The east end dumped into a metal container open on the top and except for a four inch lip, open in the front. When inspected, the container held standing liquids just below the front lip and a center mound of solids \approx 8 inches high. In front of the container was a pile of tar pitch (\approx 5 gallons) on the ground. This was reportedly spillage from emptying the container which was last done almost a week earlier. Nearby was a non-hazardous refuse collection area. Another estimated five gallons of tar pitch had been dumped in with cardboard and rags and coated with sand. This constituted improper disposal.

Page 3 Mr. P.T. Sullivan, President Rouge Steel Co., Dearborn, MI

RE: MID 087738431

4. 40 CFR 265.16. This section requires a facility to train personnel that handle the wastes. The training should consist of the hazards of the material, proper everyday handling procedures and contingency (emergency) procedures.

The company was cited for lack of training after the 1984 inspection. The company stated during the May, 1985 inspection that training needs would be addressed after the revision work on the contingency plan was completed. This was logical. The finished contingency plan was submitted October 30, 1985. Without any details, this plan states that training will be given.

During this inspection, when asked to see the training records and information, the company supplied a one-page sheet that discussed the training supplied in each area. These were vague and incomplete. At the time these were thought to be the new plans the company referred to above. However, during a background file search for this letter, an almost exact copy of the training papers dated 1981 were found. A copy is attached. The facility obviously never revised these or developed new ones.

It was pointed out to the company representatives that this training detail was insufficient. This was more than evident in that: (1) the tar pitch spillage was left for a week; (2) tar pitch was discarded in with non-hazardous debris; (3) no respirators were in use in the tar pitch construction area; and (4) the facility had been illegally solidifying hazardous waste without a license (discussed below).

5. 40 CFR 270.71. This section requires that during interim status a "facility shall not: (1) Treat, store or dispose of hazardous waste not specified in Part A of the permit application; (2) employ processes not specified in Part A of the permit application: . . "

During the inspection, the injection well shed was being vacuumed clean of standing liquids. When asked what was done with this material, the inspectors were told that it was solidified in the same pit as the runny tar pitch such as that in decanter container. The solidification pit was observed to the east of the well head. It appeared to be a depression of liquids within black particulates. The area was approximately a square sixty feet on a side. This was adjacent to a coal pile and it was difficult to tell where the coal spills stopped and the pit began. The entire area appeared to be on unprotected soils. As no liquids are allowed in a waste pile, this area could only be described as a lagoon.

Page 4 Mr. P.T. Sullivan, President Rouge Steel Co., Dearborn, MI RE: MID 087738431

> This solidification operation also results in the facility being in violation of:

- (1) Notification
- (2) Liner requirements
- (3) Groundwater monitoring
- (4) Certification
- (5) Closure

A nearly concrete area was observed. According to plant personnel this was built to replace the solidification area pit. The company representative stated they were fully aware of the importance and emphasis placed on land disposal units and that they weren't supposed to be solidifying the tar pitch from the new decanter process. This indicates on going knowledge as well as the fact that a major expenditure was made to construct the concrete area. According to a company letter dated March 26, 1986, this operation has ceased. A copy of the letter is attached.

40 CFR 262.40. This section covers the manifesting requirements for generators. It includes maintaining copies for three years.

The facility was cited for manifest violations during the 1984 inspection. These were corrected. However, the company apparently failed to explain the requirements fully as this inspection found that copies were being retained for only one year.

This inspector believes that it is obvious from the attached file summary that the facility's regulated portions and related compliance expands with each inspection as forced to by the inspector. As the facility is so large and the history indicates substantive and repetitive noncompliance, it is being recommended that this facility be inspected more thoroughly in the future. This could be done by one person on a quarterly basis or one inspection by three inspectors.

You are requested to respond to this letter within thirty-days providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

Margaret A. Fields

Hazardous Waste Division

MAF/aw

Gerald Doroshewitz, Rouge Laura Lodisio, EPA Al Howard, HWD, Permits

Jerry Amber, SSECO, Ford Ben Okwumabua, District Supervisor



3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

March 26, 1986

Ms. Margaret A. Fields' Hazardous Waste Division Michigan Department of Natural Resources Southeast Michigan Field Office 15500 Sheldon Road Northville, Michigan 48167

RECEIVED

MAR 27 1986

HAZARDOUS WASTE DIV

Subject: Rouge Steel Company - EPA ID. No.: MID 087 738 431

Dear Ms. Fields':

In response to your inspection visit on March 14, 1986, this is to advise you that plant activities associated with the handling of decanter tar sludge (K087) at the Coke Ovens ceased on March 14.

The area you described, approximately 30 ft. by 30 ft., was located on a 827 ft. by 70 ft. concrete pad which formerly served as the foundation of a coke battery that was dismantled and removed in the mid-1930s. The area was covered with coke breeze (fine particles of coke that consist almost entirely of carbon). From March 20 to March 24, 1986, approximately 200 cubic yards of sludge, coke breeze, and soil were removed from this area for disposal at Wayne Disposal, Inc. The area was scraped down to the concrete foundation.

Following your visit, plant procedures for handling the sludge have been modified. As you know, one new sludge decanter has been installed with an above ground collection box. A steel plate has been welded to the box to close the open side. Construction to replace the other decanter is underway. Sludge from this decanter is currently collected in a concrete pit. Upon replacement of the second decanter, now scheduled to be on-line in June, sludge from both decanters will be collected in above ground steel boxes. Demolition of the old tar decanter -- which is scheduled for this summer-will permit the old tar collection areas and grounds to be cleaned up. Upon your next visit to Rouge Steel Co., we would be pleased to show you these improvements, which are part of a \$2.3 million facility upgrade.

Sincerely.

Gerald Doroshewitz

Environmental Control

cc: J. S. Amber Laura Lodisio STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON "LENE J. FLUHARTY HEN V. MONSMA U. STEWART MYERS

U. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

March 19, 1986

Mr. Gerald Doroshewitz Supervisor - Environmental Control Rouge Steel Co. 3001 Miller Road P.O. Box 1699 Dearborn, MI 48121-1699

RE: MID 087738431

Dear Mr. Doroshewitz:

This letter is to confirm our discussion held during the site inspection on March 14, 1986, regarding the coke area solidification pit.

As this area has been used for solidification of hazardous waste (KO87) it must be handled as a non-notified/noncompliant hazardous waste surface impoundment. Therefore, until this issue can be resolved, the present solidification operation must cease. The newly constructed concrete basin can be used for non-hazardous wastes only.

It is expected that I will be able to advise you further regarding this and the inspection in an inspection letter prior to April 1st.

If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

Margaret A. Field's

HAZARDOUS WASTE DIVISION

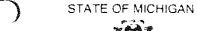
MAF: jmg

cc: U.S. EPA, Region V

B. Okwumabua FMC-SSECO ATURAL RESOURCES COMMISSION

THOMAS J ANDERSON A CAROLLO ACOB A HOEFER STEPHEN F MONSMA HILARY F SNELL

PAUL H. WENDLER HARRY H WHITELEY





S.L. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

May 21, 1985

Mr. Gerald Doroshewitz Supervisor - Environmental Control Rouge Steel Company 3001 Miller Road P.O. Box 1699 Dearborn, MI 48121-1699

MID 087738431

Dear Mr. Doroshewitz:

On May 7, 1985, acting as a representative of the United States Environmental Protection Agency, I performed a reinspection of your facility located at the above address. The purpose of this inspection was to evalute compliance of your facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

The initial inspection dated October 8 and 10, 1984, resulted with a company response dated November 15, 1984.

In the response the company set the following compliance dates. The status of each as of the reinspection are included below.

- Waste analysis plan No date was set for completion. This plan did not seem deficient but was in need of revisions. Waste stream sampling had been done but results and plan revisions were still pending.
- 2. SPCC/PIP/Contingency Plans Projected completion date March 1, 1985. These plans had several serious problems which were complicated by the facility's organization and interrelationship with other company sites within the same complex. A draft plan was available and scanned but not reviewed. Prepared by a contractor, the plan promised to be comprehensive. The final plan will be submitted for review when available; this is expected by early June.
- Training The training needs were to be addressed upon completion of the revised contingency plan.
- Tar Pitch Spillage The operating procedures have changed to control and prevent tar pitch spillage. Future plans include new equipment which will eliminate this and control organic emissions.

Mr. Gerald Doroshewitz May 21, 1985 Page 2

- Notification of Local Agencies The new contingency plan will be supplied to the local agencies when finalized.
- 6. Emergency Coordinator To be resolved with the contingency plan.
- 7. Manifest Confusion Resolved by the company's November response. This area will be evaluated during future inspections.
- 8. Hazardous Waste Marking Completed. However, one comment; the electric furnace dust bin was reportedly labeled when initially inspected in October on the only side not observed, the side towards the plant. This was chosen because it was the side visible to your employees. This is logical and in most instances would seem adequate. Is there a potential for a truck driver driving up to the bin, receiving a load, and leaving without knowing the material was hazardous? Is there a potential for spill or fire fighting crews to be working in the area without knowing hazardous waste may be involved? If so, in this case the labeling of another side should be considered.
- 9. Containment The previous letter sought to point out the potential for environmental and personnel exposures. Except for close proximity, the acid and caustic storage handling is reportedly well controlled so as to prevent mixing and personal exposure. The environmental protection afforded by the limestone bed is under review. It was confirmed that the area does not have containment, but there are no present requirements for containment of corrosives.

What hasn't been resolved is dependent upon the contingency plan which is expected to be in final form in June. It appeared that much thought and preparation was being put into the plan. The plan will be reviewed and commented upon as soon as a copy becomes available.

If you have any questions, please call me at (313) 459-9180.

Sincerely,

Margaret A. Field's

HAZARDOUS WASTE DIVISION

cc: U.S. EPA Region V B. Okwumabua



3001 Miller Road P. O. Box 1631 Dearborn, Michigan 48121-1631

November 15, 1984

Ms. Margaret A. Field's Hazardous Waste Division Michigan Department of Natural Resources 15500 Sheldon Road Northville, MI 48167

Re: MID087738431

Dear Ms. Field's.

In response to your letter dated October 15, 1984, concerning your visit to our facility on October 8, and 10, 1984, we have prepared the following comments corresponding to each of the items in your letter.

Item 1.B2a

Waste generating processes have remained relatively unchanged since the last waste analyses were performed and it is unlikely that the nature or character of the waste streams have changed significantly. However, the waste analysis plan does call for an annual analysis and all but two waste streams have been resampled since the MDNR visit on October 10, 1984. Flue dust from the Electric Arc Furnace was not resampled because that facility has been shut down for the past three months. The other waste, lite oil muck, is generated only when a lite oil storage tank is removed from service for cleaning. This waste will be resampled during the next cleaning cycle.

It has been suggested that more physical analysis should be included in the waste stream characterization and that the waste analysis plan should be rewritten. We are planning to engage the services of an independent consultant with experience in hazardous waste analysis and management to advise us on plan revisions and to assist in the analysis of our waste streams. The consultant will be visiting our facility during the week of November 19, 1984, to begin working with us.

Items 2.84, C&D and 3.85

The Spill Prevention Control and Countermeasure (SPCC)/Pollution Incident Prevention (PIP) plan was modified in 1981 to include hazardous wastes. The total plan is for the entire Rouge Manufacturing Complex which includes the Rouge Steel Company and seven other Ford Motor Company components. Each of these components is under separate management, but share a number of utilities including some sewers and outfalls. Primary responsibility for all outfalls, except 006, is to the Environmental Services Section, T&TO, A Ford Motor Company operations group.

IMP-07-01

Items 2.B4, C&D and 3.B5 (Continued)

Outfall 006 services the tailrace drainage area and is the responsibility of the Rouge Steel Company.

The SPCC/PIP plan was developed before the promulgation of federal hazardous waste management regulations. The plan included four liquid wastes generated by Rouge Steel Company which were subsequently characterized as hazardous wastes. After the promulgation of the hazardous waste management regulations three other wastes were included in the plan. As the plan was amended to address additional regulatory requirements, three procedures for reporting and responding to spills and emergencies evolved.

We have concluded, subsequent to the MDNR visit, that the plan is complex and that the portions relating to hazardous waste management must be separated from the existing plan and clarified. An independent contingency plan to address hazardous waste will be prepared and should be completed by March 1, 1985. The issues raised by the MDNR will be clarified in this revised plan so that the plan can be more easily awdited.

With respect to training, the primary and alternate emergency coordinators have been enrolled in courses 050 and 055 of the Michigan Hazardous Waste Industry Training and Technical Assistance Program sponsored by Michigan State University. Other training needs will be addressed upon completion of the revised contingency plan.

Item 4.C1

The tar spillage in the tar pitch loading area has been removed and the area will be maintained. Maintenance on heaters in the naphthalene settling tanks has been completed and the tank covers have been replaced. This has remedied the problem of visible naphthalene crystals that the MDNR observed at the tar pitch pit.

Item 5.C6, D1b

The sections of the current SPCC/PIP plan pertaining to hazardous waste management are being separated from the plan and will be assembled for submittal to local police and fire departments, as well as the Oakwood and Henry Ford Hospitals. These organizations will be asked to acknowledge receipt of the plan using an accompanying acknowledgement letter as suggested by the MDNR. When the contingency plan is revised in 1985, it will also be submitted to these same agencies with instructions to discard the current plan.

Item 6.DIC

The present SPCC/PIP plan addresses three types of spill incidents as follows.

- Spill incidents which pose a threat to public waters (excluding the tailrace drainage area).
- Spill incidents which pose a threat to public waters from the tailrace drainage area (outfall 006).
- . Incidents involving hazardous wastes.

The SPCC/PIP plan has been updated to name the primary and alternate emergency coordinator for each type of incident. Copies of the revised sections are included.

Item 7. Appendix GN-B

The Rouge Steel Company ships hazardous waste from three locations.

The Hi-Line shipping office was erroneously identified by the MDNR as the shipping location for spent pickle liquor. Spent pickel liquor is shipped from the Cold Mill Shipping Office. Since your visit the manifests have been matched and are all accounted for. The Shipping Clerk has been reinstructed in the proper procedure. Until May, 1984, waste pickle liquor was being sold and was not a hazardous waste. It is now being manifested for disposal.

The gas line drip water is shipped out of the Hi Line shipping office and the MDNR did examine several manifests for the waste.

TSDF copies for three manifests in the Hi Line shipping office files were missing at the time of the MDNR visit. The TSDF copy for Manifest No. MI-0275268 has been received and is included.

With respect to Manifest Nos. MI-0275206 and MI-0275209 showing shipments of tar decanter sludge on January 4, and January 18, 1984, respectively, our investigation indicates that these manifests were erroneously generated and no shipment of this waste was made.

Neither the supervisor for the tar decanter sludge loading area, Mr. V. Miller, nor the driver of Truck No. 8292 (shown on the manifests), Mr. W. Barnes, have any recollection of the two transports in question.

Item 7. Appendix GN-B (Continued)

A log sheet, kept by the Ford Motor Company Allen Park Clay Mine (the disposal facility), was reviewed since they did not possess these two manifests. The log sheet is a record signed by the transporter upon arrival to the site and includes information on the Truck No., Waste Material, Quantity, and the Time In and Time Out of the facility. Explanations of these two manifests and the disposal facility's log sheet are below.

MI 0275206

Only the generator possesses a copy of the manifest. Neither the transporter nor the disposal facility have this manifest on record. The log sheet of FMC Allen Park Clay Mine shows no entry on 1-4-84 of W. Barnes, or Truck No. 8292, or any waste tar decanter sludge. Apparently the shipment never transpired.

MI 0275209

The generator and the transporter possess a copy of the manifest. The disposal facility does not have this manifest on record and the transporter's copy is without signature from the disposal facility. The log sheet of FMC Allen Park Clay Mine indicates W. Barnes transported debris to the clay mine at 1:31 p.m. Since this was not a hazardous material, a manifest was not given to the disposal facility. It appears Manifest No. MI 0275209 was erroneously generated.

The disposal facility log sheet for the month of January shows only one entry for tar decanter sludge - on 1-25-84.

Ms. Jeanne Lecker, Supervisor of MDNR Manifests, was also contacted and found no listing for Manifest Nos. MI 0275206 or MI 0275209 in the MDNR computer file. Other shipments of manifested wastes by the Rouge Steel Company in January 1984 were located in the computer file. This also suggests that shipments of tar decanter sludge were not made on January 4 or 18.

An EPA Exception Report is not necessary since it appears that hazardous waste was not shipped.

Item 8. Appendix GN-C.

The electric furnace dust silo was marked *Dangerous Hazardous Waste* during the inspector's visit. Signs for the other storage tanks have been ordered and will be installed on the tanks (see enclosure).

Item 9.

The MDNR mistakingly identified the approximately two foot high concrete tank saddles as containment barriers. These concrete structures are the means of holding the vertical tanks off the ground. This area commonly referred to as the "tank farm" is not diked but the complete area under all of the tanks is covered by a 5 foot deep limestone bed which would effectively neutralize any spilled acid (see enclosed pages 54, 55 & 56 of the Oil and Critical Material Inventory of the SPCC/PIP Plan, non-tailrace drainage area). The area is attended by a employee classified as a "HCL Acid Farm Attendant". This person is located in a building in the farm area. An attendant is always on duty when there is any shipments of waste pickle liquor, when acid and caustic is received, or when the Cold Mill is operating. The attendant has gauges for each tank at his location which monitors for unusual changes in levels that would indicate a spill is occurring in the system.

In addition to having an attendant on duty when materials are transferred between the delivery trucks and tanks, the connections for acid and caustic tanks are different to prevent the delivery to the wrong tank. The connection between the acid tank or the spent pickle liquor (spent acid) tank and truck is a flange connection, secured by four bolts. The connection between the caustic tank and truck is a screw connection.

We have addressed or corrected all of the problems identified in your letter. Rouge Steel is committed to clarifying and simplifying other areas of our waste management program.

If you require any additional information please contact Mr. Doroshewitz at 323-1260.

Very truly yours,

J. A. Esper, Manager

Plant & Equipment Engineering

Enclosures

/GD

cc: J.A. Amber

K.K. Doyle

F.L. Pilzner

H.M. Schaeffer

J.A. Scott

W.W. Smith

H.I. Weinberg

DETROIT GEFIL

STATE OF MICHIGAN



JAMES J. BLANCHARD, Gov

DEPARTMENT OF NATURAL

RONALD O. SKOOG, Directo 15500 Sheldon Roa Northville, Michigan 4

October 15, 1984

City, State, and A

e SENDER: Complete Rems 1, 2, 3, and 4.

Add your address in the "RETURN TO"

1. The following service is requested (check one).

Show to whom and date delivered

(CONSULT POSTMASTER FOR FEES)

CERTIFIED MAIL

NATURAL RESOURCES COMMISSION THOMAS .: ANDERSON E. R. CAROLLO

MARLENE J. FLUHARTY

STEPHEN F MONSMA

O STEWART MYERS

RAYMOND POUPORE

HARRY H. WHITELEY

Mr. Gerald Doroshewitz Supervisor - Environmental Control ROUGE STEEL COMPANY 3001 Miller Road P.O. Box 1699 Dearborn, Michigan 48121-1699

RE: MID087738431

Dear Mr. Doroshewitz:

On October 8, and 10, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility at the above address to evaluate compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. On October 8th, the participants were the two of us. On October 10th, Larry AuBuchon, another RCRA inspector, and C.H. Porter of Ford's SSEC Office also participated.

As a result of the investigation, it has been determined that the facility is in violation of the requirements of Subtitle C of RCRA. The specifics are listed below with reference to the inspection report format, i.e. B2a would be Section B, question 2a of the report.

- B2a. The facility was not in compliance with the facility waste analysis plan which stated that analysis of the waste streams will be performed at least annually. The last analysis of the Final Cooling water was performed in 1980. 40CFR 265.13(a)(4)(b) requires that a waste analysis plan must be developed and followed. The facility representative stated that the waste stream processes have remained unchanged. If so, the facility could be brought into compliance by rewriting the plan to require additional analysis only when the generating processes or materials are altered. Of course, if this approach is taken, it will be necessary for the facility to be fully aware of processes, materials and any changes made with these.
- B4, C, & D. The facility had not examined the waste streams to determine what, if any, special handling or exposure precautions were necessary. The potential or possible spill incidents had not been determined either. Therefore, it was not possible to identify 1) what safety or emergency equipment would be necessary; 2) what could be identified as monitoring equipment; 3) what type of equipment problems, spills, etc. could be

(continued)

starce ber

OFFICIAL **BTATS C**

SENDER INSTRU

- 2. (continued)
 expected; 4) what should be included in an inspection schedule; 5) what
 emergency services or agreements could be necessary, etc. The facility
 had at least three different spill type plans which were confusing,
 incomplete and even contradictory. One of these did apparently require
 monthly inspections of various storage and operating areas. However,
 these lacked details such as emergency and monitoring equipment, types
 of problems to be looked for, time, etc. These factors addressed above
 are required by 40CFR 265 Subparts B, C, and D.
- 3. B5. The facility must be able to respond to #2 above before the plan can adequately identify those employees that need training and what type of training is needed. The plan did address most items for the Final Cooling Water (UIC) but did not for the tar pitch, electric furnace dust, drip tanks or pickle liquor operations. Some training was provided but there was:

 1) no system to identify or provide new employees with training within six months; 2) no identification by name or job what employees needed training to ensure all received it; 3) no indication of annual review, and 4) no evidence of any training of the emergency coordinators.
- 4. Cl. The facility had not cleaned up tar spillage in the tar pitch loading area as required by the facility contingency plan. There was also visible evidence of naphthalene crystal release to the air. 40CFR 265.31 requires that "Facilities must be maintained and operated to minimize the possibility of... any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents...".
- 5. C6, D1b. There was no documentation that copies of the contingency plan had been submitted to outside agencies as required by 40CFR 265.53. However, the facility representative verbally stated that copies had been given to the Dearborn City Police and Fire Departments. The on site medical service was reportedly the only medical assistance necessary. This should be reevaluated as it is suspected that such a service unit would not be capable of handling a large number of people if a major incident occurred.
- 6. Dlc. The plan did not list any emergency coordinator by name. This is required by 40CFR 265.52(d).
- 7. Appendix GN-B. The facility's coke area manifests included at least two shipments for which they had not received a signed copy from the TSD and had not filed exception reports as required by 40CFR 262.42. The electric furnace dust manifest records were excellent. The Hi-Line waste pickle liquor and gas line drip manifests were unorganized and it could not be determined whether these were in compliance.
- 8. Appendix GN-C. The tar pitch, pickle liquor, furnace dust, and gas line drip storage tanks were not marked "Hazardous Waste" as required by 40CFR 262.34.

(continued)

9. During interim status, containment is not required for short term storage. However, the inspector would like to address the waste pickle liquor (WPL) storage. The facility had three very large (20,000 gallons or larger) tanks of WPL, two of new acid and one caustic storage tank. These were provided with concrete containment. The fact that the facility tried to provide containment was good but not successful. Concrete is basic and would be expected to react with acid and deteriorate. Even if this were not the case, the containment structure was ineffective for all but center leaks on the tanks. Even drippage, let alone an actual leak from the tank ends, would not be contained. Another consideration is the potential of spillage from the caustic and acid tanks simultaneously or delivery of the wrong material to the wrong tank. This could result in high heat, pressure development and evolution of dangerous vapors. It is recommended that these aspects be reviewed.

You are requested to respond to this letter by November 16, 1984, providing documentation to this office regarding actions taken to correct these violations. Please send your response to the Northville address listed above in this letter.

If you have any questions regarding this matter, please feel free to contact this office at (313) 459-9180.

Sincerely,

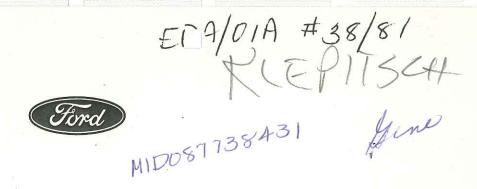
Margaret A. Field's

HAZARDOUS WASTE DIVISION

MAF/sh Enclosure

cc: J.Bohunsky B.Okwumabua

EP 🕰



Steel Division Ford Motor Company 3001 Miller Road Dearborn, Michigan 48121

November 30, 1981

Hon. Anne M. Gorsuch, Administrator U.S. Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

Attention: Hazardous Waste Export Division for Oceans and Regulatory

Affairs (A-107)

Subject: Notification of Hazardous Waste Exports

Dear Ms. Gorsuch:

Pursuant to 40 CFR 26.50, this is to notify you that the Ford Motor Company, Steel Division, may export wastes which are potentially hazardous under 40 CFR 261,21 during 1982. These wastes are identified as follows:

EPA Hazardous Waste I.D. No.

DOT Shipping Description

D 001

Waste, Flammable Liquid, N.O.S.

D 003

Hazardous Waste, Liquid, N.O.S.

The consignee for these wastes would be TRICIL, P.O. Box 786, Corruna, Ontario, Canada.

Very truly yours,

M. S. Costantino, Manager

Environmental Control





3985 RESEARCH PARK DRIVE ANN ARBOR, MICHIGAN 48104 313/761-1389

September 5, 1985

Mr. John A. Scott ROUGE STEEL COMPANY 3001 Miller Road P.O. Box 1697 Dearborn, MI 48121-1699

Dear Mr. Scott:

Enclosed is the data generated on the samples obtained by us in compliance with your hazardous waste control program. The data on the four light oil muck samples indicated that this material is not hazardous under the RCRA guidelines. The remaining materials do indicate at least one hazardous characteristic, except for the electric arc furnace dust. I have been informed that the characteristics of this dust can change significantly depending upon the character of the feed materials used in the furnace. Consequently, I am not sure what the potential would be for delisting this material without further testing.

Very truly yours,

ENVIRONMENTAL CONTROL TECHNOLOGY CORPORATION

John E. Schenk

Tive Vire President

JES/crn

Enclosure

32074

MATERIAL

Coke Oven Tar Sludge

PRYSICAL STATE

Black, "Sticky", Amorphous Solid - Phenolic & Naphthalene Odor

RCRA CHARACTERISTICS

IGHITABILITY

PLASHPOINT

61°C

CORROSIVITY

DE

N.A.

REACTIVITY (mg/l)

CYANIDE

SULFIDE

TOXICITY-EXTRACTION PROCEDURE (mg/1)

Arsenic	0.004	LLAD	< 0.02
BARIUN	0.08	MERCURY	< 0.000
CADMIUM	< 0.02	SELENIUM	< 0.002
COPPER	< 0.02	SILVER	< 0.01
CHRONIUM	0.05	ZINC	0.06



TO:

SUBJECT:

OBJECT:

1

Attachment RECANTER SCHOGE

CENTRAL LABORATORY

D. O'Connor

Part Number:

Supplier:

Specification:

for information.

LABORATORY INVESTIGATION REPORT

Number 500015 April 2, 1985 Tar Sludge - DECANTER Not Provided Not Provided Rouge Steel Company Perform physical and chemical tests on the submitted sample

TEST DATA:	Results	Specification
Extraction Procedure (E.P.)a		
Toxicity Test; (SW 846, Method 1310)		
Cyanide, mg/L	0.01	20
(EPA 600/4-79-020, M 335.1)	0.01	20
Hexavalent Cromium, cr ⁺⁶ , mg/l	3.5	wa.
(standard Methods, 15 th Ed,		
1980, Method 312-b)		
ionitability b		
Ignitability b Flash point	None till	>60°
(ASTM D96)	70°C	
(ASTR D30)	•	
Reactivity		
Reaction with 1N Hydrochloric acid		
west-on with the hydrocillot is acto.	No Violent	
	Reaction	
Reaction with IN Sodium hydroxide	No Violent	
The death of the contract	Reaction	
	· · · · · · · · · · · · · · · · · · ·	
Reaction with Water	No Violent	
	Reaction	
Corrosivity b		
pH		
(10g in 100 ml water)	6.4	> 2 and < 12.5
(EPA-600/4-79-020, M 150.1)		, 2 6.16 (12.5
Dencity (-/-)		
Density (g/ml)	1.222 at 87°C	
(ASTM D1298-80)		
% Solids (w/w)		
(ACTM DATE)	(23.1	

(ASTM D473)



CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

Number 500015

TEST DATA: (cc

(continued)

Results

Specification:

Phenols (Total), mg/Kg
(EPA-600/4-79-020, M420.1)

3049

Naphthalene. (w/w)
(Gas chromatography)

5.4%

"a" - Michigan Act 64 of 1979, maximum concentration of contaminants for characteristic of extraction procedure toxicity.

"b" - Specification for evaluating solid waste, EPA solid waste - 846, 1982.

Metals results will be forwarded separetly by Inorganic Section, Metallurgy Department.

Concur:

A. Galloway, Supervisor

Environmental Section Chemistry Department

DPL/pp

by: Diago P lobes

U. MULopes

Laboratory Specialist



CENTRAL LABORATORY

LABORATORY INVESTIGATIVE REPORT

500015

June 1, 1985

10:

David O'Connor

SUBJECT:

Part Name: Tar Sludge Part Number: Not Provided Specification: Not Provided

Supplier:

Not Provided

OBJECT: \

Determine elemental composition of the submitted

sample for information purposes only.

TEST DATA:

Results are reported in mg/L.

Arsenic				<0.1
Barium				0.05
Cadmium			1	<0.1
Chromium				<0.05
Copper			•	< 0.05
Lead				<0.1
Mercury				<0.03
Nickel				< 0.03
Selenium		1. 300		<0.1
Silver	÷	14		<0.3
Zinc			• •	1.1

Analyzed by Inductively Coupled Plasma Emission Spectroscopy

R. Floyd

Metallurgy Dept.



CENTRAL LABORATORY SERVICES

LABORATORY INVESTIGATION REPORT

MABUFACTURINE EMERCERINE: & ENVIROMMENTAL CONTROL STEEL 7 - 1818

NUMBER 105723

HOV 15 U San

November 16, 1981

TO	8

John F. Schultz

SUBJECT:

Decanter Tank Tar Sludge Supplier: Steel Division

OBJECT:

To determine density and % solids as well as phenol and napthalene contamination of Decanter Tank Tar Sludge for information.

TEST DATA:		Results	Specification	Analyst
•	Density	1.21 g/ml	ASTM D891	BAS
- *-	% Solids (% Non-Volatiles)	80.00 %	FLTM BI 2-1	BAS
_	Phenol	2137.234 mg/L	EPA79 M420.1	BAS/JF
	Napthalene	3.307 g/kg	HPIC	$ ext{DPL}$
:	Cyanide	17.39 mg/L	EPA79 M335.2	BAS

Concur:

J.A. Galloway, Section Supervisor

Environmental Section Chemistry Department by B. A. Schigelon 11-16 81



CENTRAL LABORATORY SERVICES

Attachment

GENERAL SERVICES

LABORATORY INVESTIGATION REPORT

8-29-80

TO:

G. M. Hutter

SUBJECT:

Coke Oven Tar Sludge

OBJECT:

Test per request.

TEST DATA:

1. E. P. Toxicity per U. S. E. P. A. SW-846, 1980

Element	Results, ppm	Specification Limits, ppm	Method of Analysis
Arsenic '	(0.1	5	EPA 600/4-79-020
Barium	<0. 8	100	EPA 600/4-79-020
Cadmium	<0.00 5	1	EPA 600/4-79-020
Chromium	<0.1	5	EPA 600/4-79-020
Lead ,	0.2	5	EPA 600/4-79-020
*Mercury	(0. 2	0.2	I. C. P.
Selenium	< 0.25	1	EPA 600/4-79-020
Silver	<0.1	5 ·	EPA 600/4-79-020
Mercury	0.1	0.2	

^{*} A supplemental report will follow with Mercury values tested to EPA 600/4-79-020.



CENTRAL LABORATORY SERVICES GENERAL SERVICES

LABORATORY INVESTIGATION REPORT

NUMBER 005092

TEST DATA:

(Continued)

Page 2

2. Ignitability per U.S. E.P.A. SW-846, 1980, Section 4.0

Flash Point ASTM D 93

· **>**60 c

3. Reactivity per U.S. E.P.A. SW-846, 1980, Section 6.0

Total Cyanide E.P.A. 79, M3352

10.65 ppm

Concur: A. A. Galloway, Section Supervisor

By K. J. Reauma C. Halla W. Kollmeyer

Anvironmental Section Chemistry Department

Concur:

D. Craig, Supervisor Metallurgy Department

and a managed and the second of the second o

KGR:CH:NK/em





Inter Office

Steel Division

April 23, 1981

T::

R. D. DeWalt

G. E. Haggerty

W. W. Smith

R. J. Walsh

ee:

R. E. Bailey

W. E. Hlake

J. A. Esper

P. Jorgensen

R. V. Majors

T. H. Malinowski

E. J. O'Shaughnessy

H. B. Patterson

D. E. Saylor

C. R. Stohl

D. R. Turner

M. P. Wojtowicz

R. M. Wood

J. R. Zimmer

Subject: Hazardous Waste Management and Spill Prevention Training

The U.S. EFA hazardous waste management regulations require that employes who manufile hazardous wastes receive either classroom or on-the-job training by May 19, 1981, to respond effectively to emergencies. The regulations also require that a record of those who receive training be maintained until thick years after the employe discontinues employment with the Company. They was must take part in an annual review and all new employes must receive training before working in unsupervised positions.

To implement the training requirements, we have ordered copies of SSECO's tocklet entitled "Pollution Spill Prevention Program" for Superintendents and General Superintendents. The booklets are not yet available, but will be forwarded as soon as they arrive.

In the meantime, training of all employes who handle hazardous wastes should begin as soon as possible so that it may be completed by May 19, 1981. Waste materials which are considered hazardous under EPA regulations include the following:

- . Coke Oven drip water
- Final cooler water (from the Coke Oven By-Products area)
- . Waste halogenated solvents
- . Electric Furnace flue dust
- . BOF flue dust coarse
- . Coke Oven tar sludge
- . Coke Oven light oil muck (decanter sludge)
- . Spent pickle liquor

Training procedures to insure Division compliance with EPA requirements are attached. Also attached are signature sheets to meet the record maintenance requirements of the regulations. When the training is completed, a copy of the training procedure and the signature sheet should be retained in your green "Flant Compliance Book". A copy of each signature sheet should be returned to Mr. J. A. Scott for our records. If additional assistance is needed to implement this program, please contact Mr. Chris Porter at 32160.

Attachments

SPILL PREVENTION PROCEDURE - COKE OVENS

Equipment Related to "WW" Building (Pump House), Primary Gas Coolers, Tar Decanters, Pitch Pit, Weak Liquor Storage Tanks, Coal Collecting Tanks, Final Gas Coolers, Oil Scrubbers, and Deep Well System

If a line is ruptured or a leak is found at any of the above areas, notify By-Products Surervision immediately and take corrective action.

- a) close off valves necessary to control spill
- b) build a temporary dike if necessary to prevent any spillage into the sever system or tailrace
- c) make necessary repairs

If a leak or rupture is found at the tar decanters:

- a) shut off valves at leaking compartment
- b) build a temporary dike if necessary, to prevent any spillage into the tailrace or sewer system
- c) make necessary repairs

If the pumps at the pitch pit are inoperative and the pit overflows:

- a) build a temporary dike to prevent overflow from going into tailrace
- b) shut off drain valves to stop overflow
- . 'c) make necessary repairs to equipment to bring pit to safe level

If a leak or rupture occurs at the weak liquid storage tanks:

- a) shut off necessary valves to control spill
- b) if possible, drain tank to AC still operations
- c) build temporary dike to prevent any spillage into sewer system or tailrace
- d) make necessary repairs

If tar collection tanks leak or rupture:

- a) shut off necessary valves
- b) if possible, drain tank to storage below leak level
- c) build temporary dike to contain spill to prevent spillage from going into tailrace or severs
- d) make temporary repairs

If a leak or rupture occurs at the final coolers or related piping:

- a) close off valves and shutdown pumps necessary to stop spillage
- b) build temporary dike to contain spill and prevent spillage from going into tailrace or sewers
- c) make necessary repairs

If a leak or rupture occurs at the oil scrubbers or related piping:

- a) close off valves and shutdown pumps necessary to prevent spillage
 b) build temporary dike to contain spill and prevent spillage from going into tailrace or sewers
- c) make necessary repairs

If a leak or rupture is found in the deep well system:

a) shut down deep well pump

b) shut off bleed valve from main circulation line

c) shut off valves at deep wellhead and in filter system

- d) build a temporary dike around the break to contain the leak in order to prevent spillage into the tailrace or sewers
- e) make necessary repairs

By-Freducts Supervision will call By-Products Superintendent and Coke Ovens General Superintendent. The By-Products Supervisor will also make out a report in triplicate of the incident. This report must be written on the same shift that the incident occurred.

History of Light Oil Spill - January, 1974

A spill occurred when the drain line for the line used to pump light oil from the receiving tank to the storage tank was not closed off. The check valve on the storage tank failed and light oil drained from the storage tank to the light oil pump. The valve on the storage tank had been left open. It should have been closed. The oil built up in the sump and drained into the tailrace. The switch for the sump pump had been turned off. Presently, this switch is left on at all times. The sever line in the water side of the pump has been blanked and a steam syphon is being used to keep the water at a safe level.

A written report of any incident shall be forwarded to the Environmental Control Office, Room 2112, Rouge Office Building. Also, a copy of the report shall be inserted in the crea compliance book.

LEGAL CONTACT: Roger Grimes

(312) 886-6595

TECHNICAL CONTACT:

Laura L. Lodisio

(312) 886-7090

MEDIA CONTACT:

Virginia Donahue

(312) 886~6694

FOR IMMEDIATE RELEASE:

U.S. EPA FILES ADMINISTRATIVE SUIT AGAINST ROUGE STEEL COMPANY FOR HAZARDOUS WASTE VIOLATIONS

The U.S. Environmental Protection Agency (U.S. EPA) today announced the filing of a civil administrative action against Rouge Steel Company. The complaint against the company proposes a penalty of \$36,750 and charges that the facility located at 3001 Miller Road, Dearborn, Michigan has violated Federal regulations regarding the generation, treatment and storage of hazardous waste.

U.S. EPA is seeking the civil penalty from Rouge Steel Company for failure to meet requirements relating to the generation, treatment and storage of hazardous waste in containers, tanks and a surface impoundment.

Rouge Steel Company has the right to request a settlement conference and/or a hearing with U.S. EPA concerning the allegations within 30 days.

SEP 0 3 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

George Kircos, Senior Attorney Ford Motor Company The American Road Room 554-WHQ Dearborn, Michigan 48121-1899

Re: Rouge Steel Company
U.S. EPA ID No. MID 087 738 431

Dear Mr. Kircos:

As discussed in the settlement conference with United States Environmental Protection (U.S. EPA) staff on August 20, 1986, I am enclosing a copy of a regulatory clarification document regarding "totally enclosed treatment facility" pursuant to 40 CFR 260.10(a). This should be helpful to Rouge Steel Company in the preparation of their submittal to demonstrate an exclusion pursuant to 40 CFR 265.1(c)(9).

If you have questions or desire further assistance please contact Roger Grimes at (312) 886-6595 or Laura Lodisio at (312) 886-7090.

STRESHAL SIENED BY WILLIAM E. MUND

William E. Muno, Chief RCRA Enforcement Section

bcc: R. Grimes (5CS-16) R. Karl (5HE-12)

L. Lodisio (5HE-12)

P 593 668 412 LODISIO (5HE-12), U.S. RECEIPT FOR CERTIFIED MAIL NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL (See Reverse) U.S.G.P.O. 1983-403-517 SGeorge Kircos Ford Motor Company The American Road PROOM 554 WHO Dearborn, MI 48121-1899 Postage EPA, Certified Fee 230 Special Delivery Fee S Restricted Delivery Fee Return Receipt Showing to whom and Date Delivered Dearborn, Chicago, Return receipt showing to whom, Date, and Address of Delivery \$2.01 TOTAL Postage and Fees Feb. 3800, Postmark or Date PS Form

	5HE-12 - LLODISIO				
PS Form 3811, July 1983					
	George Kircos, Senior Attoeney Ford Motor Company The American Road Room 554-WHQ Dearborn, Michigan 48121-1899				
	4. Type of Service: ☐ Registered ☐ Insured ☐ Cod ☐ Cod ☐ Express Mail Article Number P 593 668 412	MID 087 738 431			
	Always obtain signature of addressee or agent and DATE DELIVERED.				
DOWESTIC METORN	5. Signature – Addressee X 6. Signature – Agent				
5110	x M Moral				
in I O	7. Date of Delivery				
AN DECEM	8. Addressee's Address (ONLY if requested and fee paid)				